

**PROPOSED SOUTHLAND WATER AND LAND PLAN**

**Summary of Decisions Requested Report**

**PROVISION ORDER**

**Notified Wednesday 30 November 2016**




## SUMMARY OF DECISIONS REQUESTED GUIDELINES

As with all regional and district plan reviews and plan changes, the Resource Management Act 1991 (RMA) requires the council to prepare a report summarising all the decisions requested. The information below outlines how the submissions were summarised and provides guidance on how to navigate the Summary of Decisions Requested (SDR) report.

The report is made up of concise summaries of the decisions requested in submissions. The report is not intended to be a summary of the submissions in their entirety and does not include reasons for the request or other supporting material included in the submissions. The original submission should be referred to if you are seeking to make a further submission, or to fully understand the issues raised by a submitter.

Each submitter has been given a unique number and the submission point is coded against the plan provision, as shown below.

<b>Sub ID &amp; Sub Point</b>	<b>Submitter</b>	<b>Provision</b>	<b>Position</b>	<b>Decision sought</b>
900.5	BLOGGS Joe	Rule 70	Support	Retain.



Sub ID is the submitter identification number (900) and Sub Point is the 'coding' of the submission (5).

Where the decision requested is unclear, this is stated, and the reader ought to refer to the original submission.

Many submissions included a request for 'any such consequential amendments' or similar. Such requests have not been included in the summary of decisions requested. The Hearings Panel will be able to consider consequential amendments during the course of the hearings.

## General comments relating to whole Plan

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
4.1	Achamohr Dairies & McFadzien Group Dairies	General	Oppose	Propose some standards around water quality and land developments, but do it in a way that isn't Big Brother i.e. policed or checked up on, get the word out in your newsletters and in time word will do the rest.
5.1	ADAMS A J & P G	General	Amend	Have an effects based plan, not risk based.
7.1	AdBest Partnership	General		The whole plan heavily depends upon rule making.
17.1	Alliance Group Ltd	General		That, in the event that the amendments sought by Alliance are not implemented, the Proposed Water and Land Plan be withdrawn.
19.1	Allison Family Farms Ltd	General		Clarify ES contribution to the financial cost of the FMP and continued monitoring of the environment required by the farmer.
19.2	Allison Family Farms Ltd	General		Amend provisions to consider financial cost of ongoing consents.
21.1	ANDERSON Toni	General		Improve scientific research before implementing. Simplify consenting and Management Plan requirements to reduce farmers' paperwork.
25.1	Ardel Dairies Ltd	General	Oppose	Why is there no reference to the future limits that are going to be enforced as the next phase of the plan? These limits need to be set by the community as they can evaluate what their goals and restrictions are. As once made fully aware of the cost to the community they might chose to administer the limits in a different way. The time frames for these limits to be achieved need to be loose enough that science can keep up to allow minimal economic burden whilst the reduction process occurs.
26.1	Ardoyne Farm Dairys	General		Amend to acknowledge the contribution of urban communities to water quality.
26.2	Ardoyne Farm Dairys	General	Oppose	We see very little in the plan that measures or takes account of the economic impacts these rules will have on the community in general.
27.1	Arkley Farm Ltd	General		That the plan be reviewed after 3 years and disregard any items that have made no measurable environmental benefits. To investigate the costs to all parties and make this publicly available before the plan is finalised.
31.1	AYERS Warren	General		Amend to provide more urban provisions.
32.1	B D Farm Trust	General – whole plan	Support Amend	Amend to provide greater lead in time and roll out of policy/rules to allow good science and better adoption to occur.
39.1	BAIRD N J & S A	General		Instead of taking a one shoe fits all attitude, ES should identify the problem farms/farm

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				practices and educate these farmers/farms to minimise the damage and not assume that every farm/farmer is causing environmental damage.
47.1	Balfour, Wendonside & Waikaia Group	General		Generally, the group supports the intent of the Proposed Southland Water and Land Plan (PSWLP), and Councils commitment to 'holding the line' in terms of water quality in the Southland region.
49.1	BARCLAY Todd (Member of Parliament – Clutha Southland)	General	Support Oppose	I support Council's intention to "hold the line" on water quality from now until the limit setting process to ensure that the province is working towards limit setting and minimise the challenges associated with that process.  However I do not support elements of this Plan which go beyond "holding the line" and impose regulation which will have a significant economic impact on the region.
54.1	Bayswater Dairy Ltd	General		We are disappointed that there is such a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also. Waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects all contribute towards declining water quality, and this Plan should have stronger regulation of these activities.
54.2	Bayswater Dairy Ltd	General		We feel that there needs to more detail in the Plan to detail where the responsibility lies and what penalties will be applicable. No guidance of who is responsible for the farm management plans is included e.g. 50/50 sharemilker vs. land owner, lease holder vs. land owner. There is also no overview of how the penalty system will work.
56.1	BEATTIE Michael & Lynley	General	Support	Generally, I support in principle the Water & Land Plan except where previously stated.
56.2	BEATTIE Michael & Lynley	General	Oppose	I would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
62.1	Beef + Lamb NZ	General		Amend thresholds and timelines to support Farm Environment Plans without requiring a resource consent.
70.1	Betapahu Farms Ltd	General	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
80.1	BLAKELY Barney & Stephanie	General		Need to be looking at the farms causing the most impact.
82.1	BLOMFIELD M J & K G Trust	General	Support	We generally support in principal the Water and Land Plan except where stated elsewhere.

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82.2	BLOMFIELD M J & K G Trust	General Economic impact	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
86.1	BOWMAR Ross	General	Oppose	Provide information in the transactional (overhead) cost associated with implanting and monitoring this plan.
102.1	Burwood Station Ltd	General	Support	I generally support in principle the Water and Land Plan except where stated elsewhere [see provisions throughout plan].
103.1	BYARS A R & L J Trust	General	Oppose	Remove Page 2.
104.1	BYARS Digby	General		Support the Federated Farmers' submissions.
116.1	CAMPBELL Jenny	General	Support	Support whole plan.
116.2	CAMPBELL Jenny	General		I agree with the focus to shift all land owners towards good management practices to get the best gains for maintaining water quality.
116.3	CAMPBELL Jenny	Indigenous Biodiversity		Indigenous biodiversity needs to be encouraged on all farming properties, especially in riparian strips and as shelter belts along with species to attract bees.
129.1	CHRISTEY Anthony	General		Include stricter provisions to protect against urban contamination.
130.1	CHRISTIE Raymond John	General	Support	Regional Pest Management Strategy - maybe Environment Southland and Department of Conservation look at their own patch e.g. Piano Flat area and further up Waikaka River. Seed movement contaminating flood plain.
135.1	CLARKE A W & T M Partnership	General		The Plan should have a Review process as more information comes to hand to enable farmers and Environment Southland to work together through the changes in future.
142.1	CLEARWATER G S & M A	General	Oppose	Please refer to Telford Trial which proved sediment and nutrient reduction by way of grazing direction i.e. start grazing away from waterways strongly support GMP with regards to cultivation. Oppose getting a consent, due to time delays and extra costs.
145.1	CLELAND JA & DM & SJ Partnership	General	Oppose	Amend Plan to put more responsibility on Environment Southland for responsibility of the Waikaka River in particular willow clearance above and below the Waikaka Bridge.
150.1	CLIFFORD Mervyn & Judy-Ann	General	Support Oppose	It would be essential for a cost analysis to be completed to ensure that the financial cost will result in a significant improvement in water quality. We should use some of the plan as a guide for good farm management practices (similar to the project on the Pomahaka.)
151.1	CLINTON Peter	General	Oppose	In general we agree with the sentiment and objectives of this plan but we oppose it in its current state.

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160.1	COLLING Megan	General	Oppose Amend	Include provisions to control urban industries or city dwellers polluting storm water or other water ways.
161.1	COLLINS Gary	General	Oppose	We oppose the fact that you have provided no evidence of economic data regarding the imbalance created by these plans for environmental over profitable farming.
161.2	COLLINS Gary	General	Oppose	We sternly oppose that you believe that there should be blanket coverage of water requirements throughout Southland. Some areas will require greater volumes than others due to location, weather patterns.
162.1	COLLINS Rachael	General	Oppose	We oppose the fact that you have provided no evidence of economic data regarding the imbalance created by these plans for environmental over profitable farming.
162.2	COLLINS Rachael	General	Oppose	We sternly oppose that you believe that there should be blanket coverage of water requirements throughout Southland. Some areas will require greater volumes than others due to location, weather patterns.
167.1	COPLAND M C & S	General		Include as an alternative provision a requirement that every farmer supply records of fertiliser purchases to ES, from their fertiliser supplier. Any farmer using excessive amounts could be traced and have their waterways tested.
171.1	Cosy Nook Farms 2007 Ltd	General		There needs to be checks and balances to safeguard farmer interests.
172.1	COWAN Les & Christine	General	Oppose	Throw out all costs for consents.
174.1	CRACK Glenys	General		If ES were to police the few rogue farmers who are flouting good management practices it would be a much more efficient and cost effective way forward. The one size fits all approach based on unproven ideals will stifle progress and make for bad relations between parties.
177.1	Cromel Valley Station Ltd	General	Support	We do support ES and this Plan and appreciate being able to submit our views.
177.2	Cromel Valley Station Ltd	General	Amend	People/farms taking the resource from the rivers need to be accountable for maintenance (Regional Pest Management Strategy).
179.1	CROOKS Jonathan Ross & Sarah Jane	General		Fair treatment of all parties affected would see similar timeframes being applied to urban communities as well as rural.
179.2	CROOKS Jonathan Ross & Sarah Jane	General		There needs to be assurance that the consents granted under the Plan will not be annual consents requiring regular expensive consent renewal costs to farmers. We suggest consent durations for winter grazing, cultivation etc. have a minimum term of 5 years or longer.
179.3	CROOKS Jonathan Ross &	General		We are in favour of education in good management practices via the Land Sustainability

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	Sarah Jane			team rather than any consents.
180.1	CROOYMANS Ton	General	Oppose	Plan created by non-farmers. Start again in close contact with farmers. Too much focus on total Southland area. Start communicating with farmers and take one step at a time.
181.1	CRUICKSHANK Peter & Liz	General		Reduce tangata whenua involvement and consultation along similar lines to the Auckland Unitary Authority.
185.1	D J & D A Anderson Ltd	General		<p>We do appreciate E.S. has put a lot of time and effort into this document and there certainly is some very good rules which can contribute to the improving quality of our waterways. However, I feel that there has been a lack of enough scientific, economic and social assessment done by E.S. It is very one sided. Some of the rules are impeding physically and financially. They do not allow us to viably continue to farm in some areas, but it also inhibits our ability to flexibly manage our properties.</p> <p>No consideration has been given in the plan of the impact forestry has with sediment run off, plus the small urban towns currently on septic tanks with storm water running into significant water ways.</p>
190.1	DairyNZ	General		Provide policy or other technical guidance on how the environmental gains that have already been delivered by Southland dairy farmers will be accounted for in the catchment limit setting process.
190.2	DairyNZ	General		Provide policy or other technical guidance outlining the circumstances in which this intensification moratorium will be lifted.
190.3	DairyNZ	General		Review the GMP fact sheets to establish whether they appropriately capture GMP and/or in the alternative provide policy or other technical guidance on the process it will use to ensure that farmers receive credit for their early adoption of mitigation measures ahead of the catchment limit setting process.
190.4	DairyNZ	General		Establish a Technical Working Group to work with primary sector stakeholders to finalise its management planning requirements. In addition, given the capacity and capability constraints that currently exist across Southland's rural support network, this Working Group should also develop plans for the implementation of the new planning requirements.
190.5	DairyNZ	General		Provide additional information regarding the principles underpinning its Industry Audited Self-Management model, and the eligibility criteria for IASM providers.
192.1	DALE P T & S B Trust	General		Why wasn't industry mentioned i.e. manufacturing, processing etc.? They should be managed the same as you manage everyone else. We don't agree with the use of physiographic zone to determine what farmers can or can't do on their land.



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195.1	DAVIE Stuart	General	Oppose	Economic and social impact studied need to be completed before plan is fully considered.
197.1	DEVINE Wade	General	Support	In order to achieve the stated objectives of the plan sustainable use of stock numbers with respect to land type and prudent use of fertilisers must be encouraged. No retrospective legislation be introduced for existing maintained systems of effluent disposal be it septic tanks or farm effluent. Providing that this can be contained within the properties. Support the sustainable use of Southlands water bodies to enable present and future generations' access to clean drinkable water and swimmable rivers and lakes.
205.1	Dillon Ag Ltd (Chris Dillon)	General	Oppose	ES to provide as they were meant to before this plan was notified, the Southland Economic Project.
206.1	Dillon Ag Ltd (Rochelle Dillon)	General	Oppose	ES to provide as they were meant to before this plan was notified, the Southland Economic Project.
209.1	DIPROSE Dave	General	Oppose	That sub catchments can be formed taking into consideration ground water zones. Consider catchments that have smaller 'from mountains to sea' catchment like the Pourakino catchment which could be tied into a larger catchment of the Aparima.
209.2	DIPROSE Dave	General		Recreational users transferring diseases pests through contaminated gear. Use the process of check, clean, dry. Raise the responsibility of using our waterways and the invasion of unwanted organisms on our ecosystems and the values of clean useable water.
210.1	Director-General of Conservation	General		Review the plan and include definitions where it is required.
210.2	Director-General of Conservation	General		Amend the proposed Southland Water and Land Plan (pSWLP) to give effect to the Southland Regional Policy Statement once each chapter has been determined by the Environment Court.
214.1	Donald Farm	General		Very detailed economic analysis of the direct and indirect costs of implementing the plan must be carried out and made available for discussion prior to approval of this plan.  This plan is very focused on rural land use and only the larger businesses. Small semi-rural and rural lifestyle properties should be included.
214.2	Donald Farm	General		Avoid (according to the Oxford dictionary means "refrain from"). <u>Recommend</u> using minimize instead of avoid.
215.1	Dooley Partnership	General		I would like to see a major differentiation between sheep and cattle/deer. We need to separate these classes of stock.

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219.1	DRUMMOND R G & J M	General	Support	We generally support in principal the Water and Land Plan except where previously stated.
219.2	DRUMMOND R G & J M	General	Oppose	Rules within this plan will have a big financial impact we would like to see an option where farmers are able to monitor their water quality.
224.1	DUFFY Paul	General	Support	Support provided the consenting process isn't too complex and expensive for farmers carrying out normal farming practices.
227.1	DUNBAR M	General	Oppose	Oppose whole plan. [see original submission for detail].
229.1	DUNNAGE Tony	General	Oppose	Oppose Water and Land Plan. Submitter seeks to "start again."
231.1	DYER Stephen	General	Oppose	Oppose entire Plan.
245.1	Enfield Ltd	General	Oppose	Provide past, current and future data that can be endorsed in the plan including economic impact data.
247.1	Environment Southland	General	Amend	Amend references to 'Farm Management Plan' to read 'Farm <u>Environmental</u> Management Plan'.
247.2	Environment Southland	General	Amend	Replace 'secondary allocation' with 'supplementary allocation' where it appears throughout the plan.
247.3	Environment Southland	General	Amend	Amend to make: <ul style="list-style-type: none"> <li>• improvements in wording and grammar;</li> <li>• structural changes to provisions that do not affect meaning and content;</li> <li>• numbering improvements;</li> <li>• typographical and grammatical corrections, including those that improve readability or sentence structure; and</li> </ul> any consequential and similar changes to wording in other submission points.
249.1	Ernslaw One Ltd	National Environmental Standards	Amend	Correct factual error that there are only two National Environmental Standards (NESs) relevant to the Plan, by citing a further 3 NESs and 1 proposed NES as listed here. Make clear that an NES, as higher level RMA regulations, define matters that are: 1- out of scope for the Regional Land & Water Plan or 2: enable Regional & District Councils so set more stringent standards than those defined in the NES. Acknowledge that the proposed NES for Plantation Forestry is likely to come into effect before Council makes decisions on its Land & Water Plan.
251.1	Euan Crump Farming Co	General	Amend	Make consents free for 5 years to establish goodwill and education process.

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254.1	EVANS Harold	Freshwater management plan	Oppose Amend	Amend catchment group areas so they are smaller for the Pourakino catchment to be separated out from the Aparima.
258.1	Eyre Creek Ltd	General	Oppose in part	<p>Perform an independent review of the cost and benefit analysis of this plan. Identify the costs to farmers and subsequent economies using independent economic &amp; social bodies. Then identify the supposed improvements in water quality that will result from this using an independent scientific body. This report needs to be independently peer reviewed locally and internationally by relevant independent parties and made available for concerned parties. The implementation of any regulation needs to be delayed until such time this cost benefit analysis has been comprehensively achieved. In the interim adoption of best practice farming policies will ensure the objective to 'hold the line' in water quality is achieved.</p> <p>Any potential gross profit denied as a result of the plan needs to be met with monetary compensation of equivalent value.</p> <p>A three year pre-determined independent review of the plan and its scientific, economic and social effects must be committed to before imposing regulation. There needs to provision for any adjustments at the occupier's request, NOT ES to any plans as a result of the findings of these reviews.</p> <p>Multiple independent scientific bodies should be employed to undertake the scientific investigation using different internationally and locally approved methods. The scientific investigation should be peer reviewed by approved independent international and local scientific bodies with the reports made public to allow affected parties an opportunity to understand results and reasoning for subsequent regulation subsequent to findings IF necessary. Conflicted parties be replaced by impartial qualified candidates.</p> <p>The study needs to demonstrate;</p> <ol style="list-style-type: none"> <li>1) A source</li> <li>2) A completed pathway</li> <li>3) That the timing makes sense</li> <li>4) That the glove fits</li> </ol> <p>(Dr M. Sklash 2014)</p>

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				<p>More purpose built monitoring wells should be installed in non-compromised zones. More monitoring should be done to isolate any problems horizontally and vertically and the water tested should be aged.</p> <p>IF sources of contamination are found these should be elaborately monitored to better understand them.</p> <p>Until these structures are achieved and a bedrock of data can be used as basis for informed decision, the adoption of best practise farming policies will achieve the objective of 'holding the line'. Allow more sensible time frames between scientific investigation &amp; cost benefit analysis and imposing of regulations. In this case ensure that a comprehensive scientific investigation is completed before using it structure a plan change. In the interim adopt best practise farming principles to achieve the 'holding the line' objective.</p>
258.2	Eyre Creek Ltd	General	Oppose in part	<p>Do not use ES to dictate farming activities. If regulation is necessary after due diligence is achieved it should be done on an effects based system which is managed by but not limited to catchment groups or a likely qualified body. Any regulation needs to be delayed until such due diligence is achieved and implemented in a sensible, gradual manner which allows time for review and provision for adjustment at the farmers request.</p>
265.1	Federated Farmers of NZ (Southland Province)	General		<p>Ensure that the Proposed Southland Water and Land Plan goes no further than set the fundamental approach for managing land and freshwater now, including the use of good management practices to underpin on-farm activities; with no significant restrictions imposed on land use before the limit-setting process.</p> <p>And</p> <p>Amend the Proposed Plan to provide for a more balanced consideration of the economic implications of the proposed regulation. In particular, that the Plan is amended overall to enable the use of water and land to provide for people's economic and social wellbeing.</p> <p>And</p> <p>The s32 report's lack of consideration of the economic cost to farmers and the wider community of the proposed provisions.</p>
265.2	Federated Farmers of NZ (Southland Province)	General		<p>Ensure that Council ensures the Management Plan contains only the essential information to reduce nutrient losses, and that farmers can draft it themselves; that the Management Plans are held by farmers for the purpose of improving on farm practices; not held by Council.</p> <p>Amend the Water Quality Standards in line with NPS-FM standards. And Clarify within the Proposed Plan that FMUs can have different standards to those contained within Appendix E. Indicate that FMUs will establish further standards in line with catchment specific</p>

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				Objectives.
265.3	Federated Farmers of NZ (Southland Province)	General	Oppose in part	Remove all references to “avoid” or “avoiding” in the Plan.
272.1	FISKEN Charlie	General	Amend	No cost to farmer and province.
277.1	Fonterra Co-operative Group Ltd	General		Clarification is needed on whether the region-wide objectives, or any other provisions of the plan, are to be regarded as freshwater objectives for the purpose of the National Policy Statement for Freshwater Management (NPSFM).
277.2	Fonterra Co-operative Group Ltd	General		Provision is needed for those farmers who consider they have been mapped in the wrong physiographic zone to be able to apply for a consent and have their application assessed based on the risks inherent to their particular property.
277.3	Fonterra Co-operative Group Ltd	General		Farming activities occurring on Fonterra’s wastewater irrigation farms should not be subject to the general farming provisions, since such activities are separately (and appropriately) controlled under other provisions in the pSWLP.
277.4	Fonterra Co-operative Group Ltd	General		The concept of IASM is retained in the pSWLP through inclusion of an additional policy specifically on the use of IASM.
277.5	Fonterra Co-operative Group Ltd	General		The concept of Independent Auditing Self-management (IASM) is retained. Amend to include appendices outlining the expectation of the IASM scheme provider (preparation, implementation, certification and monitoring), and another outlining the standards and criteria that the Council will apply to determining whether to recognise a particular IASM provider. Fonterra seeks that Council considers the principles outlined in their submission when deciding how to provide for IASM in the region-wide rules.
277.6	Fonterra Co-operative Group Ltd	General – non-farming land use activities		Forestry is a dominant land use in our catchment and we note that forestry harvesting is not regulated. The Plan should identify all land uses within Catchments and not just focus on farming. The lack of recognition of the potential environmental effects of land uses other than farming is a concern to us.
280.1	Forward Holdings Ltd	General		Bring urban water qualities up to the same expected quality of rural areas.
285.1	FRASER Doug	General	Oppose	Strongly oppose this Plan.
286.1	Frew Farming Ltd	General	Amend	Undertake some form of generic consent to farm in the future.
288.1	Fulton Hogan Ltd & Southern Aggregates Ltd	General	Support	Fulton Hogan and Southern Aggregates support the recognition of the role land and water plays in the economic and social wellbeing of the region.

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288.2	Fulton Hogan Ltd & Southern Aggregates Ltd	General – mitigation works	Oppose	Amend to: Circumstances - Where the activity for which consent is granted will cause or contribute to <u>significant</u> adverse effects on the environment which will not be adequately offset by any of the types of contribution described elsewhere in this section.
289.1	G A & L M McRae Ltd	General	Oppose	No specific decision requested.
293.1	GAMBLE S W & J M	General		This plan needs to incorporate animal welfare and climate considerations to have any substance.
293.2	GAMBLE S W & J M	General		Fenced damable silt and nutrient ponds cleaned regularly on farm outlets need to be recognised properly as an effective tool controlling both flow and quality.
297.1	GARDYNE Hugh & Kathie	General		Acknowledgement of all Southlanders as supportive of objectives contained in the Plan and delete references to specific sectors of the community as being superior, dominant or preferential to any other race or creed within the population.
297.2	GARDYNE Hugh & Kathie	General		That the Plan sets targets and limits within the physiographic zones prior to developing policies and rules to meet these presently unknown targets and limits.
297.3	GARDYNE Hugh & Kathie	General		That appendices are included that define targets and limits now, that apply to all physiographic zones that then underpin the proposed policies and rules. OR suspend the Plan until the targets and limits are confirmed.
297.4	GARDYNE Hugh & Kathie	General		We object to Environment Southland imposing policies and rules on landowners identified as not contributing to adverse water quality and submit we have freehold title rights of use and enjoyment of ownership of land that protect us from the proposed Plan.
297.5	GARDYNE Hugh & Kathie	General		The Plan targets specifically; the sectors, industries and practices that contribute to adverse water quality and simplify the proposed recording, updating and planning on other sectors, industries and practices and remove the requirement to implement management plans from those engaged in existing farming activities determined to not contribute to adverse water quality.
299.1	GARDYNE John	General	Support	No policy 19 – cannot count.
299.2	GARDYNE John	General		Let's see more control on urban non-point discharges with time frames.
300.1	GARDYNE Jonathan	General		I feel that this whole plan should include the social and economic aspect of land and water and its value to the community with education and new technology to move the region forward with an adequate environmental impact and economic return for the specific region.

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316.1	Glenaffric Partnership	General		Consider appointing a case manager that would discuss/negotiate a plan with the owners of each class of land e.g. hill country dairy grazing, hill country traditional farming, hill country deer farming. This person would have to have some experience and understanding of hill country farming practices.
335.1	GREER Robin	General		The Plan should recognise, provide for or encourage those farmers who already operate with lower levels of environmental effects. This can include organic farms but also many conventional farms whose farm activities and systems are based around similar low levels of inputs such as fertiliser.
337.1	Growplan Ltd	General		There is too much focus on L+W2016 on minima, thresholds and limits rather than targets and goals. Why not incentivise environmental performance by setting targets backed by say rates relief, consent fees relief etc.
337.2	Growplan Ltd	General		What about using phosphate detection methods that detect more phosphate (there are at least 16 methods: Olsen is optimised for super and thus detects only a fraction of total P).
337.3	Growplan Ltd	General		Good management should be replaced with 'best management practice, as this is a recognised term common to environmental science culture and literature. Best is a term about quality whereas 'good' is meaningless in this context. Jargon and specialist language is a barrier to understanding: Substituting Mean Annual Low Flow with Q95 doesn't seem to improve reader understanding.
337.4	Growplan Ltd	General		The (apparently common) incidence of a mismatch between groundwater catchment and the surface water catchment (Bidwell et al., 2008) does not appear to have been considered in this plan. I have extensively searched Environment Southland reports for mention of this phenomenon and have found nothing, not even a citation. As this becomes known it may lead to challenges where a landowner states that the runoff can't be from their land.
339.1	GUNN Olivia	General		Plan should have stronger regulation of urban/industrial activities.
339.2	GUNN Olivia	General		We feel that there needs to more detail in the Plan to detail where the responsibility lies and what penalties will be applicable.
340.1	Gunton Farms Ltd (Mark Gunton)	General		GFL has reviewed the Management Plan requirements and has concluded that once it prepares a Management Plan it will require consent as a discretionary activity. GFL is concerned that the Plan places its farming activities in a position of not being permitted and not being able to comply with the land use rules set out in the Plan. GFL submits that it is an inappropriate and unintended consequence of the Plan that its

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				<p>farming activities at Argyle are not permitted.</p> <p>GFL submits that the costs and processors associated with a requirement to obtain a Resource Consent on a discretionary basis for an activity which has successfully been undertaken for an extended period without environmental harm is inappropriate.</p> <p>GFL submits that in circumstances such as Argyle a Management Plan should be prepared, and measured against the special characteristics of Argyle so as to where appropriate ensure that its activities are permitted. The application of criteria for the assessment of a Management Plan which are generic and do not reflect the special characteristics for the property is inappropriate.</p> <p>GFL submits that it accepts the principle of preparing a Management Plan but that its Management Plan should be workable, flexible, and provide for ongoing commercial sustainability, with the overlay of achieving environmental policy outcomes.</p>
344.1	Hall Ag Ltd (Glenda Hall)	General		There should be self management of water contaminants instead of a blanket rule for everyone.
345.1	Hall Ag Ltd (John Hall)	General		There should be self management of water contaminants instead of a blanket rule for everyone.
354.1	HARPUR George	General	Oppose	<p>I am at a loss to understand how or as to why rural towns are responsible for the contamination of a product that in most cases is sourced from upstream. To a large extent open drains are channelled into pipes for convenience for all, to a point where your people can take samples, maybe this charge should be reversed.</p> <p>As I read this it appears as if when the Waiau River is low and clear we do not have an issue. However, when the control structure at Manapouri under the charge of Meridian Energy lets contaminated water down from the Mararoa River we have an issue. Is this a Southland District Council problem?</p>
358.1	HASTIE Stephen	General	Neutral	To collect real data and create an understanding from a variety of farming areas, to then informed decisions on those particular areas.
359.1	HAYWOOD Trevor	General		If I change farming practice to grazing in the future, how would this affect tile drains and creeks?
361.1	HBG AgriLimited	General		We are disappointed that there is such a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also.
363.1	HEDGES Shikaan	General		If each farmer measures the water that enters their property and leaving their property, if the leaving water is higher then further investigation following all these points should be



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				enforced.
371.1	HENDERSON Tracy	General	Support	An economic report on the repercussions of this proposal should have been put forward by Environment Southland, highlighting the costs for each type of farming to owners, sharemilkers, workers, future generations etc.
372.1	Heritage NZ	General		Review use of 'despite' and 'notwithstanding' in the rules and amend as necessary to achieve consistency and clarity.
375.1	Hillview Trust	General		Amend Plan to take into account current environment gains and levels of investment made by some farmers.
375.2	Hillview Trust	General		We promote Environment Southland to further investigate policies and objectives to share the cost and burden of maintaining and improving water quality equally across all land and water users in the entire Southland region.
379.1	HODGKINSON Roger	General	Oppose	I oppose provisions that restrict land use intensification. No specific decision requested.
386.1	Hopcroft Farms Ltd	General	Support in part Amend	I recommend collaborative process throughout the transition to the Water and Land Plan. I recommend a focus on bringing <u>all</u> parties on the journey to Limit Setting and taking the required/appropriate time to be equitable to all parties and water quality.
386.2	Hopcroft Farms Ltd	General		Waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects all contribute towards declining water quality, and this Plan should have stronger regulation of these activities.
386.3	Hopcroft Farms Ltd	General	Support in part Amend	I recommend that there is a documented process included in this Plan that details how individuals can appeal/contest the physiographic zone/s and boundaries that their landholdings have been allocated.
387.1	HORRELL Andrew Russell	General – river and stream bank erosion		Evaluate the role that river and stream bank erosion plays in estuary sedimentation. Evaluate possible mitigation strategies.
388.1	HORRELL Annette	General		Change needs to be gradual and affordable.
390.1	Horticulture NZ	General		Clarify in the Plan that the values for freshwater management will be set through the FMU process.
398.1	HUMPHRIES Lloyd	General		Support Federated Farmers submission.
402.1	HUNT Alistair & Bernadette	General		Oppose the elements of this proposed Plan which go beyond holding the line and request that these are reined in until limit setting.

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402.2	HUNT Alistair & Bernadette	General		Ensure that the rules clearly allow for the farm management plan to be altered as required throughout a year as decisions are made or changed, and that the farm management plan in no way binds the farmer to decisions made earlier in the year.
411.1	Invercargill City Council	General		Clarify the relationship of the Proposed Water and Land Plan to the Regional Coastal Plan for Southland and which provisions will be administered in respect of discharges to the Coastal Marine Area.
426.1	JOHNSTON Allan & Robina	General		The plan has provided more data than most Regional Councils to reach Central Government and Stake Holder objectives, some alternative feasible systems such as buffering, simplistic calculations which need negotiating, relevance of impact with studies but sadly yet to come, more acceptable approaches. More uniform approach with objective to relate to ISO 14000 Environment Management Practices which must give competitive advantage.
433.1	Kapuka Dairies Ltd	General	Amend	Consideration be given to the actual effects this will have on the farming community as a whole and the follow on effects this will have on the southern region as a collective – goods and services – jobs – the economy, before any decisions are made.
437.1	KEMPTHORNE Robert	General	Oppose in part	Ensure the writers adopt <b>accurate and balanced</b> tone of “preambles and tone setting statements”.
440.1	KENT Rita	General	Support	Every sector of the community must be involved to ensure this resource is protected. Two Sewage systems and septic tanks must also be compliant. The same rules must apply to the Urban population that apply to the Agricultural sector and the same time frames. Town sewerage schemes should not be allowed to discharge to water at all.
450.1	Kmore Farming Ltd	General		Consents are not necessary, good management plans and consultation on a farm by farm basis with ES would be better using guidelines instead of rules and regulations.
451.1	Knockinnon Farm Trust	General	Amend	Recommend a more collaborative approach to the Southland Water and Land Plan. All sections of Southlands community to be included. Urban, business, fishing, forestry as well as farming.
451.2	Knockinnon Farm Trust	General	Oppose	All reference to areas or percentages of land holding should be removed from the plan.
459.1	Lagore Enterprises Trust	General	Support	Ensure that all sectors of the community are working together to achieve the desired outcome. Urban and Rural sectors need to be working together under the same time frames and the same rules. Contaminate losses from town sewage and septic tanks need to be addressed immediately to get a full picture of the water quality.
477.1	Longwood Properties Ltd	General	Amend	We suggest that the principles and objectives of the plan be amended to provide parity for

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				social, cultural and economic well-being as has been outlined for water quantity and quality.
477.2	Longwood Properties Ltd	General	Oppose	The plan states that “Pursuant to Section 86B(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. We believe that all changes from the status quo should be aligned with the timeframes outlined in Rule 20 i.e. 30 May 2018.
478.1	LOVERIDGE David	General	Support Amend	I recommend a focus on bringing ALL parties on the journey to Limit setting.
478.2	LOVERIDGE David	General		There is a focus on farming when we believe that the Urban and Industrial members of our region need to be accountable for water quality also.
482.1	Lower Aparima Catchment Group	General	Support in part Amend	We recommend collaborative process throughout the transition to the Water and Land Plan. We recommend a focus on bringing all parties on the journey to Limit Setting and taking the required/ appropriate time to be equitable to all parties and water quality.
482.2	Lower Aparima Catchment Group	General	Support in part Amend	There is a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also. Waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects all contribute towards declining water quality, and this Plan should have stronger regulation of these activities.
504.1	MARSHALL Lynette	General	Amend	Would like to see an economic impact report outlining the effects of the plan on farming in Southland. This also has a great flow-on affect on related businesses.
511.1	MCCALL Ashley	General	Amend	Amend so that human waste and chemical outflow from urban areas to have more stringent monitoring.
514.1	MCCLURE Andrew	General		Provide compensation to farmers for rules impacting private property rights.
514.2	MCCLURE Andrew	General		Oppose rules with hard limits.
514.3	MCCLURE Andrew	General		A market based model such as the Emissions Trading scheme be considered. In the case of nitrogen leaching or water allocation, markets should be established – excessive polluters/takers need to compensate those who use less than acceptably agreed averages/limits.
515.1	MCCROSTIE Ray	General	Amend	Delay this plan until such time as the reports “Economic Effects on Southland, its People and its Farming Population” have been quantified. Also, a "Predicted Positive Outcomes" report must be completed and included with this proposed plan so that these can all be considered in conjunction by potential submitters.
518.1	MCDONALD Stuart &	General		We would submit that implementation of the plan should be accomplished with either

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	HALDER Robyn			present or reduced staffing levels.
518.2	MCDONALD Stuart & HALDER Robyn	General		The plan needs to publicly acknowledge the special relationship between the Southland farmer, and his land. This is just as important as the “tangata whenua”. The farmer views his role as that of the custodian of his/her land and animals.
518.3	MCDONALD Stuart & HALDER Robyn	General		The plan seems strangely silent on forestry land use. The impacts of logging operations on water are surely significant enough to warrant mention (and rules!). Are management plans and/or resource consents required to mitigate the inevitable environmental issues from logging steep land above watercourses?
519.1	MCDONALD W F & K M	General	Oppose	Treat rural and urban ratepayers equally as to their responsibilities to maintain water analysis at the same levels and quality.
522.1	McFarm Trust - Pahia	General		Urban and industrial members of our region need to be accountable for water quality also.
524.1	MCINTYRE Craig & Rebecca	General		We are disappointed that there is such a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also. Waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects all contribute towards declining water quality, and this Plan should have stronger regulation of these activities.
526.1	MCINTYRE Peter	General		My preference is a farm environment plan approach to managing these risks. This allows farmers to manage the risks without the use of rules that in some cases are a blunt instrument and may not result in the desired outcomes. I would prefer the rules in the Land and Water Plan to be more in the way of guidelines.
528.1	MCKAY A S & D E	General		Include stricter provisions to protect against urban and industrial contamination.
530.1	MCKAY Ian & Jodi	General		Environment Southland needs to be accountable for the economic impact that their changes are making.
535.1	MCKEE Tyler	General	Oppose	Clarify how fast the leaching is happening.
544.1	MCLEOD Bruce & Cynthia	General		Review rules regularly because of changing practices, climate change, new developments and the scientific models used may have to be altered.
545.1	MCLEOD Emma	General	Amend	ES to provide clarification or ruling on the roles and responsibilities of a lessee and lessor.
545.2	MCLEOD Emma	General	Amend	ES to complete and release a quantitative Economic Impact Report before the proposed plan is implemented.
554.1	McPhelzo Trust (Z, E & P	General		We request that evidence is produced by Environment Southland that demonstrates and proves conclusively that this ‘Environment Southland Land and Water Plan’ is working

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	Pullar)			cohesively for Southland and is supported fully by agencies such as Venture Southland, Southland Regional Development Strategy.
564.1	Mid-Aparima Catchment Group	General	Oppose	We feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
564.2	Mid-Aparima Catchment Group	General		We are disappointed that there is such a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also.
564.3	Mid-Aparima Catchment Group	General		We feel that there needs to be more detail in the Plan to detail where the responsibility lies and what penalties will be applicable. No guidance of who is responsible for the farm management plan is included e.g. 50/50 share milker vs. land.
565.1	MIDDLETON Lindsay	General	Amend	There needs to be more discussion/engagement/consultation with the industry's most affected by these rules to ensure that both the environmental objectives required and a sustainable and financially viable farming industry in Southland can be achieved.
577.1	MOODY Luke	General	Oppose	Minimise at every possible rule the need for consenting process.
585.1	MOUAT Alexander	General		Ensure that the provisions in the WLRP address poor management practices in the construction of the cycle trail and associated infrastructure and strengthen provisions to prevent issues such as erosion. [See original submission for detail.]
588.1	MOUAT Laurence	General		There is no provision in the plan for 'low intensity' farming practices.
589.1	Mountain Views Trust	General	Oppose	Delete restrictions on winter grazing.
601.1	NICOLSON Don	General	Oppose	Oppose the pSWLP.
603.1	Nithdale Station	General		To change the plans approach to one that focuses more on the outcomes – good quality water and not on the rules and consents. Retain good management practices and the need to do a Farm Management Plan.
615.1	O'CONNELL Dennis	General		I recommend that ES follow the approach of the NZ Landcare Trust, which with the Pomahaka Farmers Water Care Group, is working to utilise and showcase industry tools that enable farmers to improve farm practices that impact on water quality, reduce nutrient loss and improve water quality; all without punitive rules.
616.1	O'CONNELL Elizabeth	General		Providing farmers with the tools, be it good farming practices or water testing kits, will more directly affect water quality, rather than the costly bureaucratic & regulatory proposals in the W&LP.

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619.1	Opio Milk Ltd	General	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
622.1	P F Olsen Ltd	General	Amend	L & W Plan to reference Council's Regional Policy Statement on Biodiversity (once adopted).
626.1	PATERSON L J & S M	General		Checking nitrate levels in and out of individual farms should be the priority so good operators can get on with the job they are good at and not so good ones can be helped to improve, not developing a fining mentality.
627.1	PATERSON Ross	General		My suggestion is that we need to find a solution that allows landowners to control and protect the waterways on their land through a monitored and well implemented farm plan and code of best practice.
628.1	PATERSON Stephanie	General		My suggestion is that we need to find a solution that allows landowners to control and protect the waterways on their land through a monitored and well implemented farm plan and code of best practice.
631.1	PAYNE Sydney	General	Oppose	Make sensible rules on sediment run off, most silt comes from river banks.
631.2	PAYNE Sydney	General	Oppose	No charges or consents for day to day work on farms.
631.3	PAYNE Sydney	General	Amend	No cost benefit study done on effect on agriculture.
640.1	Pourakino Catchment Group	General		As a general observation we would like to see more recognition of other activities that have effects on water quality and quantity including but not limited to industry, urban and municipal land use activities.
650.1	PULLAR I J & K M	General	Amend	Plan to be more simplistic and basic guidelines.
662.1	Rayonier NZ Ltd	General		The submitter seeks that the wording of the rules in the pWALP is retained as proposed, subject to the amendments requested in the submission.
664.1	Real Journeys Ltd	General		The Plan should define the area covered by the Plan.
664.2	Real Journeys Ltd	General		The Plan should be laid out in a similar format as the Regional Coastal Plan for Southland with the objectives, policies and rules relating to a particular issue assembled together.
664.3	Real Journeys Ltd	General		The relationship between the concepts of catchments, freshwater management units and physiographic zones need to be articulated in the Plan.
664.4	Real Journeys Ltd	General		Seek acknowledgement that because of the high rainfall in Fiordland, there is an abundant water supply west of the divide on Fiordland, therefore these waterways do not need to be managed conservatively to maintain water volumes.

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664.5	Real Journeys Ltd	General		Set out in Plan when Environment Southland will be requiring testing regimes for discharge permits.
664.6	Real Journeys Ltd	General		Provide for dredging activities.
664.7	Real Journeys Ltd	General		Include in rule framework a provision to allow bed disturbance activity for clean-up work as a permitted activity.
666.1	Rimu Grasslands Ltd & Leicester Downs Ltd	General	Oppose	Target the movement of supplementary feed onto farm.
666.2	Rimu Grasslands Ltd & Leicester Downs Ltd	General	Oppose	Release an implementation plan that details this information prior to making rules operative.
667.1	Riverfield Farms Ltd	General		The proposed implementation dates are rolled back so sufficient time is allowed to fully view the impacts of the plan and gain good constructive rules prior to limit setting.
667.2	Riverfield Farms Ltd	General		All farmers should be educated through Appendix N being supplied prior to any consenting triggers.
667.3	Riverfield Farms Ltd	General		Amend the plan to include the urban sector.
668.1	Rivervale Dairies Ltd	General		We generally support in principal the Water and Land Plan except where previously stated [see submissions throughout report].
668.2	Rivervale Dairies Ltd	General	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
672.1	ROBERTSON Antony	General		Have desired outcomes that farmers can meet in their own ways than arbitrary rules and consents.
673.1	ROBERTSON Colin	General		The huge cost to administer and police the Land and Water Plan. The cost of the consents, feel that our ES rates will increase to ridiculous levels.
675.1	ROBINSON Ann-Maree	General		My request is that the speed with which these changes are expected to be achieved be lengthened and you carefully consider the financial pressure that comes with new legislation.
676.1	ROBINSON Brent	General	Amend	If change is required, it must occur at a pace and a scale which is realistic and achievable. The dates need to be extended [no specific dates requested].
684.1	ROSE David	General		Both urban and rural effects must be looked at something lacking in this document. Whether the is change needed then time must be allowed for the transition.
692.1	ROWE Emma	General		Why are there no rules around arable farming? It seems a little unfair that a dairy farmer

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				can't winter his own cows and his land value decreases yet his next door neighbour can apply 600kg/ha of urea with no restrictions.
693.1	ROY Bevan	General	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
698.1	Rural Contractors of NZ (Graeme Mathieson)	General		Retain the existing provisions, except to the extent that specific changes are made in accordance with the relief sought by RCNZ in the balance of this submission and any further submission that RCNZ may make at the appropriate time.
700.1	Rural Solutions Ltd	General		A fundamental issue here is that I don't think that regulating negative effects on water should be done via prescriptive rules about what you are allowed or not allowed to do. Rules can be put in place e.g. offset rules, to mitigate expected effects, but rules limiting the scale of any enterprise should not be applied.
704.1	Ryan Farms 2006 Ltd	General		Encourage Environment Southland to put responsibility back on individual farms through their Management Plans rather than having blanket rules and required consents.
712.1	Seaview Trust & Oraka Farms Ltd	General		Avoid the term "strongly discourage" in favour of "mitigate" in other parts of the Plan.
719.1	Sharp Trust	General	Oppose	Education is far more effective than rules and bylaws.
732.1	SMITH George & Kathryn	General		Water quality should be checked entering and leaving each property so that the farmers can remedy the situation on their property. This should be undertaken first as an educative measure while farmers assess where their problems lie and work with Environment Southland to remedy water quality and allows Southland to target problem areas. Work can be targeted to catchment areas.
732.2	SMITH George & Kathryn	General		Remove requirement for an environment plan if farming is a permitted activity.
733.1	SMITH Hamish & Karen	General		Clarify how slopes are measured when multiple grades of slope are in the same paddock approaching a watercourse.
737.1	Smithill Ltd	General	Oppose	This report does not adequately report on the likely economic impact of this Plan. There are few actual figures in it and it relies on self-ranking. Some of the rules within the plan will have significant economic effects for individuals as well as the whole Southland region. We feel that this report is not at the required standard.
742.1	South Island Eel Industry	General		All other references to fish passage in the Plan should use the same Rule change as we recommended in our submission (i.e. " <u>upstream and downstream fish passage shall not be</u>



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	Association			<u>impeded as a result of the activity</u> ”).
747.1	Southern Star Farms Ltd	General	Amend	Delay this plan until such time as the report “Economic Effects on Southland, its People and its Farming Population” have been quantified. Also, a “Predicted Positive Outcomes” report must be completed and included with this proposed plan so that these can all be considered in conjunction by potential submitters.
749.1	Southland Conservation Board	General		The area of jurisdiction of the Southland Water and Land Plan needs to be accurately defined in the introduction to the Plan.
749.2	Southland Conservation Board	General		The final version of the Plan should be appropriately annotated so that the line of logic in the Plan is clear (e.g. for each Rule, the policies to which it relates should be referenced by number: for each policy, the relevant objectives and so on).
750.1	Southland District Council	General		Ensure there is consistency between NZS1547:2012 ‘On-site Domestic Wastewater Management’ (‘the Standard’) and the rules proposed in the Draft Water and Land Plan.
751.1	Southland Farm Forestry Association	General	Support	We wish to offer support for the plan in full, although because we have been unable to review it fully we wish to have the option of further involvement on all topics.
752.1	Southland Fish & Game Council	General		Amend the pWLP to give effect to the Southland Regional Policy Statement following its approval by Council.
752.2	Southland Fish & Game Council	General	Support Amend	Amend the pWLP to include specified time frames, including start and completion dates, for individual FMU’s in relation to the setting of limits (including objectives, policies and rules).
752.3	Southland Fish & Game Council	General	Support Amend	Amend the pWLP to include baseline water quality standards for FMU’s that reflect the community expectation of a 10% improvement in various parameters compared to 2010 levels by the year 2020.
752.4	Southland Fish & Game Council	General	Oppose	Include: <ol style="list-style-type: none"> <li>Numerical criteria for technical efficiency and for what is considered reasonable in relation to water quantity; and</li> <li>A schedule which sets out what is Good Management Practice in relation to efficient use of water. This should include deferred irrigation, deficit irrigation, soil moisture testing and reporting of results, upgrading infrastructure including irrigation infrastructure to maximise efficient application of water, ensure all takes are telemetered and information is provided to the regional council via automated systems.</li> </ol>
752.5	Southland Fish & Game Council	General		Include new objectives, policies and rules to ensure that flood protection and river and lake management activities are undertaken in a manner that recognises and protects the natural

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				character of freshwater bodies and achieves the natural character and freshwater objectives.
757.1	Southwest Properties Ltd	General	Amend	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.
757.2	Southwest Properties Ltd	General	Oppose	All changes from the status quo should be aligned with the timeframes outlined in Rule 20 i.e. 30 May 2018.
761.1	STALKER Hanna & Callum	General		Plan should have stronger regulation of waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects.
761.2	STALKER Hanna & Callum	General		Provide guidance of who is responsible for the farm management plans e.g. 50/50 sharemilker vs. land owner, lease holder vs. land owner.
761.3	STALKER Hanna & Callum	General		Provide overview of how the penalty system will work.
767.1	STEVENS David	General		Consider the social impact and consequences of any planned change.
767.2	STEVENS David	General		The report on the financial impact on the wider community is absent.
767.3	STEVENS David	General		The Plan should have a review process.
767.4	STEVENS David	General		No consideration of good farming mitigation practises have been factored into anything in this Plan.
768.1	STEVENSON Audrey	General		Before plan is finished, I do think facts and scientific information is needed, and in the meantime, put information in place as a guideline. Also please treat all farmers as the same with time lines.
771.1	STEWART Family Trust (Virginia Stewart)	General	Oppose	I strongly oppose the proposed plan.
774.1	STEWART Vanessa	General	Oppose	I strongly oppose the proposed plan.
785.1	SURENDRAN Nathan	General	Oppose	No specific decision requested.
787.1	SUTHERLAND Richard	General	Oppose	Towns need to have their practices checked as well regarding waste water and sewage.
790.1	TAIT G R & J E & Waikawa Valley Trust	General	Oppose	We would welcome an annual visit from the Land Sustainability Team! Based on this we oppose the consent process as an unnecessary added cost.
792.1	TAYLER Matthew	General	Amend	I believe the objectives are disproportionately targeted toward rural land use and request modification to reflect that water quality is impacted by the whole community, urban and rural.

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795.1	TAYLOR George	General	Neutral	If a farm is deemed to be within an incorrect physiographic region, provide a simple process at no cost to the landowner for this mistake to be rectified.
797.1	Nga Runanga and TRONT	General		No part of this Plan should ignore, erode or impede the rights and interests of Ngāi Tahu whānui. Rights negotiated between the Crown and Ngāi Tahu, and recognised in law, are not to be renegotiated at the regional or local level nor ignored by Resource Management Act plans. Mahinga kai is the basis of the settlement and we expect that this will be provided for through the provisions within and the implementation of the Plan.
797.2	Nga Runanga and TRONT	Water quality		The requirement to maintain and improve water quality be established from Regional Water Plan for Southland being January 2010.
797.3	Nga Runanga and TRONT	General		Unless otherwise indicated in this submission, retain objectives and policies as drafted. Ensure that the rules achieve the intent of the objectives and policies.
799.1	TEMPLETON Peter	General	Support in part Amend	I recommend collaborative process throughout the transition to the Water and Land Plan.
802.1	The 254 Partnership & Gerken Family Trust	General		ES to provide as they were meant to before this plan was notified, the Southland Economic Project.
803.1	The Fertiliser Association of NZ	General	Support in part. Amend	Amend the Plan provide for amendment of the water quality attributes addressed in Appendix E to be applied at the FMU or sub catchment level.
806.1	The Southern District Health Board	General		We are disappointed that this plan doesn't explicitly provide information on the current state of water quality in Southland as background for the plan. It is our observation there are a number of areas in Southland where water quality has been significantly compromised through land use. These areas include but are not limited to: <ul style="list-style-type: none"> <li>• High nitrate levels in several ground water zones in Southland</li> <li>• High eutrophication risk of Waituna Lagoon.</li> <li>• "Dead" (eutrophic) areas in other estuaries.</li> <li>• High levels of faecal contamination that in some catchments is in the upper reaches.</li> <li>• Both quantity and quality risks to some public water supplies due to competing interests of water users (e.g. Gore).</li> </ul>
806.2	The Southern District Health Board	General		Public Health South strongly advocates that Environment Southland embark on a robust communication strategy as part of implementing this plan to inform the public of the current state of water quality in Southland.

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806.3	The Southern District Health Board	General		We believe that issues such as bathing water quality are important from a tourism perspective. The potential need to place warning signs due to contamination of bathing water areas creates a potential reputational risk that will need to be effectively managed.
808.1	THOMAS Alison & Roger	General		Should be different for sheep as sheep have different impacts on environment, increased costs a real concern, don't charge for land management plan reviews.
810.1	Three Rivers Catchment Group (TRCG)	General		The social and economic benefits of farming activity should be recognised in the W&L Plan through an objective and policy.
813.1	Tihaka Farms	General	Amend	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.
813.2	Tihaka Farms	General	Oppose	We believe that all changes from the status quo should be aligned with the timeframes outlined in Rule 20, i.e. 30 May 2018.
814.1	Timothy Farms Ltd	General	Oppose in part	<p>Couldn't ES spend a bit more money monitoring which farmers are well below an acceptable level of compliance and work with them to improve rather than make everyone have to comply with such stringent rules when, for the most part, they are not causing a problem. Or implementing a set of best practice guidelines as a first measure before taking such restrictive measures as the water and land plan?</p> <p>We also have some queries around consents i.e. will they be transferable to a purchaser/lessee and will there be ongoing costs in keeping them?</p>
818.1	Tomogalak Gorge Trust (John Keen)	General	Amend	I would like to see less dairy farming in Southland, less cows wallowing in mud and waterways grazed. Fragile land being sprayed off and developed. More indoor cow houses should be encouraged perhaps.
819.1	Tomogalak Gorge Trust (Linzi Keen)	General		I would like to see less dairy farming in Southland full stop. Less cows wallowing in mud and waterways grazed. Fragile land being sprayed off and developed. More indoor cow houses should be encouraged perhaps.
827.1	TURNER Paul & Kayleen	General	Support	We generally support in principal the Water and Land Plan except where previously stated.
827.2	TURNER Paul & Kayleen	General	Support	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
830.1	Upper Aparima Catchment Group	General	Support	We generally support in principle the Water and Land Plan except where previously stated.
830.2	Upper Aparima Catchment Group	General	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
831.1	VAN DER BIJL Willem	General	Oppose	Replace “landholding” throughout the plan with a measurement based on hectares or the approved farm plan.
831.2	VAN DER BIJL Willem	General	Oppose	Provide report on the economic impact on farm and on urban Southland with the new rules.
833.1	VAN ROOIJEN Marcel	General	Neutral	We generally support in principle the Water and Land Plan except where stated elsewhere.
833.2	VAN ROOIJEN Marcel	General	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
834.1	VAN ROSSUM Winy & Maarten	General		We would like to recommend that field days and/or workshops are held as an alternative to requiring farm management plans to educate farmers on good management practices.
840.1	W & B Clarke & Son Ltd	General		We are in favour of education in good management practices via the Land Sustainability team rather than any consents at all and believe this will achieve much better buy-in and support from the farming community than strict regulation and extensive compliance costs. However should the requirement for consents remain there needs to be thought around the duration of consents. It is highly impractical that consents required under the plan would be annual consents which would require regular expensive consent renewal costs to farmers and time for the processing of these consents by Environment Southland. We suggest consent durations for winter grazing, cultivation etc. need to be a minimum of 5 years.
840.2	W & B Clarke & Son Ltd	General		There needs to be an ability somehow for the boundaries and locations of the physiographic units to be adjusted in the future, and the ability for landholders to challenge the information in relation to the physiographic zoning of their property if they believe the maps are incorrect.  We believe the physiographic zone maps should not be included within the final Land and Water Plan but instead be a separate standalone document that is referred to in the plan but can be further developed and altered over time.
842.1	Waihoaka Holdings Ltd	General	Amend	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.
842.2	Waihoaka Holdings Ltd	General	Oppose	We believe that all changes from the status quo should be aligned with the timeframes outlined in Rule 20, i.e. 30 May 2018.
848.1	WARD Patrick	General		Include a provision that allows questioning of a farms physiographic zone and changing of these if necessary.
849.1	WARNOCK Barry	General		Include a rule relating to the protection of native fish species that ensures introduced predatory fish are not released after being caught, and include a limit of such fish in the Waituna catchment.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
856.1	West Range Farms Ltd (Bronwyn Chamberlain)	General	Oppose	A full economic impact report needs to be done and accepted by the community before this plan takes effect.
856.2	West Range Farms Ltd (Bronwyn Chamberlain)	General	Support	Part A. I support in principle what Environment Southland are trying to do except where stated elsewhere in this submission.
857.1	West Range Farms Ltd (Derek Chamberlain)	General	Oppose	A full economic impact report needs to be done and accepted by the community before this plan takes effect.
857.2	West Range Farms Ltd (Derek Chamberlain)	General	Support	Part A. I support in principle what Environment Southland are trying to do except where stated elsewhere in this submission.
861.1	WHITE John Copeland	General	Support in part Amend	We recommend collaborative process throughout the transition to the Water and Land Plan.
861.2	WHITE John Copeland	General	Oppose	The plan seems to use 'forage' in some instances and 'fodder' in others. Environment Southland needs to define the difference (if in fact there is any) or consistently use the same wording.
861.3	WHITE John Copeland	General		There is a focus on farming when we believe that the urban and industrial members of our region need to be accountable for water quality also. Waste water treatment, septic tanks, sewage systems/discharge, storm water and industrial effects all contribute towards declining water quality, and this Plan should have stronger regulation of these activities.
862.1	WHITE Malcolm & Pauline	General		Otago areas strategies seem more reasonable to apply to our farming practice, straightforward and practical.
864.1	Whyte Partnership	General	Support	Why are town residents not required to have a 25000L water tank to store water and to stop runoff from heavy rains into our rivers. All new houses built from now on need this; existing houses need tanks by 2020.
864.2	Whyte Partnership	General	Amend	Remove oxidising zone from regulations being imposed.
868.1	Wilkins Farming Ltd	General	Oppose in part	Perform an independent review of the cost and benefit analysis of this plan. Identify the costs to farmers and subsequent economies using independent economic and social bodies. Then identify the supposed improvements in water quality that will result from this using an independent scientific body. This report needs to be independently peer reviewed locally and internationally by relevant independent parties and made available for concerned parties. The implementation of any regulation needs to be delayed until such time this cost benefit analysis has been comprehensively achieved. In the interim adoption of best practice farming policies will ensure the objective to 'hold the line' in water quality is achieved.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Any potential gross profit denied as a result of the plan needs to be met with monetary compensation of equivalent value.</p> <p>A three year pre-determined independent review of the plan and its scientific, economic and social effects must be committed to before imposing regulation. There needs to be provision for any adjustments at the occupier's request, NOT the regulators request, to any plans as a result of the findings of these reviews.</p>
868.2	Wilkins Farming Ltd	General	Oppose in part	Multiple independent scientific bodies should be employed to undertake the scientific investigation using different internationally and locally approved methods. The scientific investigation should be peer reviewed by approved independent international and local scientific bodies with the reports made public to allow affected parties an opportunity to understand results and reasoning for regulation subsequent to findings IF necessary.
868.3	Wilkins Farming Ltd	General	Oppose in part	Conflicted parties be replaced by impartial qualified candidates.
868.4	Wilkins Farming Ltd	General	Oppose in part	More purpose built monitoring wells should be installed in non-compromised zones. More monitoring should be done to isolate any problems horizontally and vertically and the water tested should be aged. IF sources of contamination are found these should be elaborately monitored to better understand them. Until these structures are achieved and a bedrock of data can be used as basis for informed decision, the adoption of best practise farming policies will achieve the objective of 'holding the line'.
868.5	Wilkins Farming Ltd	General	Oppose in part	Allow more sensible time frames between scientific investigation and cost benefit analysis and imposing of regulations. In this case ensure that a comprehensive scientific investigation is completed before using it to structure a plan change. In the interim adopt best practise farming principles to achieve the 'holding the line' objective.
868.6	Wilkins Farming Ltd	General	Oppose in part	<p>Please take careful consideration of this submission, failure to do so will have a disastrous effect on the Southland economy. Do not use ES to dictate farming activities. IF regulation is necessary after due diligence is achieved it should be done on an effects based system which is managed by but not limited to catchment groups or a likely qualified body. Any regulation needs to be delayed until such due diligence is achieved and implemented in a sensible, gradual manner which allows time for review and provision for adjustment at the farmer's request.</p> <p>This is not an attack on ES but an observation that one body cannot practically be expected to understand and monitor something of such scale to the degree of detail required without</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				compromising objectives. Local knowledge is an asset which should be capitalised not ignored.
870.1	WILKINS Raymond	General	Oppose	Simplify the PSWLP and include more local decision making. Show the financial impact on the area. No need for physiographic areas. Find source of exiting polluting areas and fix them as done in USA
875.1	Willowbank Farms 2015 Ltd & Avondale Dairies	General	Support	We generally support in principle the Water and Land Plan except where stated.
875.2	Willowbank Farms 2015 Ltd & Avondale Dairies	General	Oppose	We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect.
878.1	WILSON Douglas	General		Object to the nanny state governance controls suggested in much of this plan proposed under Environment Southland's umbrella.
881.1	Windyridge (Fleming) Ltd Farm	General		ES to provide funding of native trees for waterways on farm properties.
883.1	WING Darren & Jenny	General		Financial cost - Nowhere in the plan has any allowance been considered to the financial cost to farmers and to further businesses of implementing this plan. I believe there to be a considerable cost, both directly to farmers which will flow on indirectly to businesses that rely on profitable farming to make a living.
885.1	WINTER Graham & Robin	General		Remove restrictions on change of farm use.
885.2	WINTER Graham & Robin	General		Amend the Plan to take into account those who already have done the hard yards, fenced off waterways to stock, done plantings and beautification of berm areas for now and the future.
888.1	WOOLHOUSE K A & J A	General	Oppose	Please exclude all Maori wording in documents.
888.2	WOOLHOUSE K A & J A	General		Identify who is contributing to nutrient and silt levels above these that happen naturally in our environment and make them remedy and pay for their infraction.
889.1	WRIGHT David	General	Oppose	Oppose Southland Water and Land Plan. Follow Otago's example and base water quality on testing at farm source. More scientific information required from Council on where water quality is degrading, not just at estuary.
895.1	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	General		<ul style="list-style-type: none"> <li>a) Achieve the purpose and principles of the Resource Management Act 1991 (RMA) and consistency with the relevant provisions in Sections 6 - 8 RMA;</li> <li>b) Assist the Council to carry out its functions of achieving the integrated management of the effect of the use, development or protection of land;</li> </ul>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				c) Meet the requirements of the statutory tests in section 32 of the RMA; d) Address, as relevant, the considerations identified by the Environment Court for planning instruments in decisions such as Long Bay-Okura Great Park Society Inc v North Shore City Council (and subsequent case law); e) Avoid, remedy or mitigate any relevant and identified environmental effects;

## Preamble

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
63.1	BEGGS N W & C E	Preamble	Neutral	Make cross reference to studies and results which substantiate this preamble
265.4	Federated Farmers of NZ (Southland Province)	Preamble - Paragraph 1 and Paragraph 2	Oppose in part Support in part	Rewrite preamble as follows: This Plan forms part of a suite of planning instruments which manage Southland's water and land resources. It provides a regulatory tool for a variety of issues relating to these resources, with particular emphasis on the management of activities that may adversely affect the quality of the region's freshwater, <del>much of which is deteriorating.</del>  In Southland, water shapes the landscape, the economy and the region's way of life. Water is a taonga - a treasure of the people and there is a collective responsibility to look after it now and into the future. Southland also has a diverse range of highly productive land uses that <del>contribute to</del> <u>drive</u> the region's prosperity and will <del>likely</del> form the foundation of further growth and expansion. The ongoing intensification of land use, both urban and rural, brings challenges to the environment (including people), particularly in terms of maintaining <del>those natural qualities of importance</del> <u>water quantity and quality.</u>
437.2	KEMPTHORNE Robert	Preamble	Oppose in part	Revise wording at the end of paragraph 1 "much of which is deteriorating" as this isn't true.
652.1	PULLAR Mary	Preamble	Oppose	We request that evidence is produced by Environment Southland that demonstrates and proves conclusively that the 'Environment Southland Land and Water Plan' is working cohesively for Southland and is supported fully by agencies such as Venture Southland, Southland Regional Development Strategy.
768.2	STEVENSON Audrey	Preamble	Oppose	If Maori wording is needed please put in English translation.
866.1	WILKINS Brendan	Preamble	Oppose	Publish actual data that shows the actual state of water quality in Southland.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
888.3	WOOLHOUSE K A & J A	Preamble	Oppose	Please exclude all Maori wording in documents.
888.4	WOOLHOUSE K A & J A	Preamble	Oppose	I would like Environment Southland to abandon this around the table conceived document in total and explore the rules and objectives put in place by the Otago Regional Council which focuses on those individuals who are contributing directly to water pollution. They use multiple tests at water outlets compared to control tests and rules are based on individual soil CEC's and topography.  E.S. needs to adapt good science policies and not simply sit around the table dreaming up policies that they hope will fix a problem. They need to identify who is contributing to nutrient and silt levels above those that happen naturally in our environment and make them remedy and pay for their infraction.

### Te Mana o te Wai

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
103.2	BYARS A R & L J Trust	Te Mana o te Wai	Amend	Translate
299.3	GARDYNE John	Te Mana o te Wai	Oppose	“much of which is deteriorating.” Needs dropped from statement.
300.2	GARDYNE Jonathan	Te Mana o te Wai	Oppose	No specific decision requested.

### Introduction

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
81.1	BLAKELY Hamish & Hannah	Purpose of this plan		Environment Southland must consider and include provisions to control the environmental impact that urban built up areas are having on the water quality in Southland as well as the farming areas that have diversified.
160.2	COLLING Megan	Introduction - Framework of this Plan and Freshwater Management Units	Amend	Amend to make Pourakino catchment area a group of its own.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
209.3	DIPROSE Dave	Treaty of Waitangi	Neutral	To consider the economical delays and timing of operations and set a desirable time frame for consents to be issued.
265.5	Federated Farmers of NZ (Southland Province)	Introduction - Framework of this Plan and Freshwater Management Units	Support in part	That Council ensures the Proposed Plan: <ul style="list-style-type: none"> <li>• is effects-based;</li> <li>• addresses real and immediate issues with water quality, not attempt to cover off 'risks' to water quality in future;</li> <li>• enables the use of land and the discharge of contaminants to provide for Southlanders' economic and social wellbeing; and</li> <li>• recognises farmers' efforts to reduce contaminant losses before limit-setting.</li> </ul> And Ensure the introduction is consistent with Policy 45.
277.7	Fonterra Co-operative Group Ltd	Statutory context of the plan	Oppose	Amend the description of the Resource Management Act 1991 to acknowledge its broad purpose. This will be consistent with Objective 2 of the PSLWRP.
300.3	GARDYNE Jonathan	Framework of the plan and freshwater management units	Oppose	To reassess the term water quality and to discuss ways in which we can maintain rivers better so there is less sediment lost downstream.
358.2	HASTIE Stephen	Introduction	Oppose	Shouldn't have to have a resource process as there are no applicable benefits to anyone.
622.2	P F Olsen Ltd	Introduction	Amend	Amend National Environmental Standards paragraph to correct factual error that there are only two National Environmental Standards (NESs) relevant to the Plan, by citing a further 3 NESs and 1 proposed NES as listed here.  Make clear that an NES, as higher level RMA regulations, defines matters that are: <ol style="list-style-type: none"> <li>1. out of scope for the Regional Land and Water Plan or</li> <li>2. enable Regional and District Councils so set more stringent standards than those defined in the NES. Councils so set more stringent standards than those defined in the NES.</li> </ol> Acknowledge that the proposed NES for Plantation Forestry is likely to come into effect before Council makes decisions on its Land & Water Plan and use some of the NES rules basics to achieve alignment.
743.1	Southern Farms NZ Ltd	Introduction - Framework of this	Amend	Create a smaller sub catchment group for the Pourakino Catchment as this river does not go through any towns.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Brendon Phillips)	Plan and Freshwater Management Units		
749.3	Southland Conservation Board	Purpose of the plan	Support	Retain.
749.4	Southland Conservation Board	Framework & FMU's		Further explanatory comment of the concepts “Physiographic Zones”, “Catchments”, and “Freshwater Management Units” should be included in the Introduction to the Plan.
797.4	Nga Runanga and TRONT	Partnership between ES and Ngai Tahu ki Murihiku	Support	<p>Retain this section but amend as follows:</p> <p>Amended text for Partnership between Environment Southland and Ngāi Tahu ki Murihiku</p> <p><b><u>Partnership between Environment Southland and Ngāi Tahu ki Murihiku</u></b></p> <p><u>As tangata whenua of Murihiku/Southland<sup>1</sup>, Ngāi Tahu share a strong connection to the natural environment (including lands, coasts, water, air and biodiversity) of the area.</u></p> <p><u>Ngāi Tahu have a tribal council, Te Rūnanga o Ngāi Tahu, which is made up of 18 Papatipu Rūnanga who hold the rights and responsibilities to defined areas of land and waters within the takiwā (area) of Ngāi Tahu. The following four papatipu rūnanga in Murihiku/Southland are the principal mana whenua and kaitiaki for the Southland region and make up Ngāi Tahu ki Murihiku:</u></p> <ul style="list-style-type: none"> <li>• <u>Waihōpai Rūnaka;</u></li> <li>• <u>Te Rūnanga o Ōraka-Aparima;</u></li> <li>• <u>Hokonui Rūnaka;</u></li> <li>• <u>Te Rūnanga o Awarua.</u></li> </ul> <p><u>By exercising kaitiakitanga (guardianship), Ngāi Tahu ki Murihiku actively work to ensure that spiritual, cultural and Mahinga kai values are upheld and sustained for future generations. Kaitiakitanga in this context includes; ensuring the protection, restoration and enhancement of the productivity and life-supporting capacity of mahinga kai, indigenous biodiversity, air, water, land, natural habitats and ecosystems, and all other natural resources valued by Ngāi Tahu ki Murihiku.</u></p>

<sup>1</sup> Te Rūnanga o Ngāi Tahu Act 1996

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Environment Southland and Ngāi Tahu ki Murihiku have an enduring and legitimate relationship, established over a number of years. Environment Southland is an active participant and signatory to, Charter of Understanding – He Huaraki mā Ngā Uri Whakatupu, signed by the southern councils and Ngāi Tahu ki Murihiku. The Charter sets out the common goal of "the sustainable management of the region's environment and for the social, cultural, economic and environmental wellbeing of the community, for now and into the future".</u></p> <p><u>The Charter provides for an on-going relationship to assist in developing the capacity of Māori to contribute to the decision-making processes. Additionally, the Resource Management Act (RMA) has specific obligations for regional councils regarding; kaitiakitanga, the principles of the Treaty of Waitangi, Māori in decision making as well as the relationship between Māori and their culture and their traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.</u></p> <p><u>For Ngāi Tahu, the management of the natural resources in the region is dealt with in a holistic way and this Plan reinforces that approach. There is no specific or separate section in this document that deals with tāngata whenua matters. Rather, tāngata whenua themes and issues have been integrated through this Plan to reinforce the Ngāi Tahu philosophy of ki uta ki tai.</u></p> <p><u>Water, and land, like all things in the natural world, are seen by Māori as having the spiritual qualities of mauri (life force) and wairua (spiritual dimension). The continued wellbeing of these qualities is dependent on the physical health of the water and land, which in turn affects the mana of the kaitiaki. These spiritual qualities can both be adversely affected by activities such as; taking and using water, discharges of contaminants to land and water, the diversion of water from one catchment to another and the clearance of vegetation, wetlands and drains.</u></p> <p>The principal elements identified as being of importance to tangata whenua in relation to waterbodies and land include:</p> <ul style="list-style-type: none"> <li>Mauri and wairua - Protection of the mauri and wairua of rivers, lakes and wetlands;</li> <li>Mahinga kai - Adverse effects on mahinga kai and harvested aquatic species, including tuna (eel), kanakana (lamprey), inanga (whitebait), waikōura (freshwater crayfish), waikākahi (freshwater mussels) and wātakirihi (watercress);</li> <li>Wāhi tapu and other taonga - The protection of wāhi tapu and areas or resources associated with water and the beds of rivers and lakes that are of special significance;</li> <li>Special significance of particular waterbodies and Ngāi Tahu landscapes - Recognition of the special significance of particular rivers and lakes to iwi and the aspirations of iwi to develop, use and protect water.</li> </ul> <p><b>Treaty of Waitangi</b></p> <p>The Ngāi Tahu Claims Settlement Act passed in 1998 put into effect the terms and redress</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>package agreed to by Ngāi Tahu and the Crown to mitigate and remedy breaches of the Treaty of Waitangi. The Act includes several mechanisms specifically designed to be used in implementing other legislation such as the RMA and Fisheries Act 1996. These mechanisms legally recognise the importance of natural resources to Ngāi Tahu.</p> <p><u>This Act sets out legal requirements within the RMA that this plan must follow.</u> These areas are known as statutory acknowledgement areas, tōpuni features, nohoanga (campsites alongside specified rivers and lakes), mahinga kai, and taonga (treasured or valued) species of plants and animals. Appendix B sets out the full details of each of these.</p> <p><b>Mahinga Kai</b></p> <p>Mahinga kai is central to the Ngāi Tahu way of life and a principal component of environmental management. Mahinga kai is about places, ways of doing things, and resources that sustain the people.</p> <p><b>Whenua</b></p> <p>Ngāi Tahu cultural landscapes, nohoanga, tribal properties and Māori lands maintain continuity between the past, the present and the future, binding Ngāi Tahu to the whenua. Respect for the places that are important to Ngāi Tahu includes actively managing uses and activities on those lands. Reconnection with lands through access and customary use recognises the mana of Ngāi Tahu on the landscape, and restores the ability of Ngāi Tahu to give practical effect to kaitiaki responsibilities.</p> <p><b>Mātaitai and Taiāpure</b></p> <p>Mātaitai reserves and taiāpure are part of the suite of management tools created under Part IX of the Fisheries Act 1996. Mātaitai are designed to give effect to the Treaty of Waitangi Fisheries Claims Settlement Act 1992 by developing policies to help recognise use and management practices of Māori in the exercise of non-commercial fishing rights. The tools provide practical recognition of the rights guaranteed to tangata whenua under the Treaty of Waitangi.</p> <p><u>While mātaitai are predominantly in coastal marine areas legislatively there can be freshwater mātaitai. Within Southland, mātaitai comprise of coastal and inland areas with the Maitai River Mātaitai Reserve being the first freshwater mātaitai in New Zealand. The quality and quantity of freshwater, and the use of land, have direct and indirect effects on the regulations of all mātaitai and on the customary rights of Ngāi Tahu.</u></p>
872.1	William J Watt Consulting Ltd	Southland Region	Amend	Define the area of jurisdiction of the Southland Water and Land Plan in the Introduction to the Plan, specifically whether it includes the Coastal Marine Area.
877.1	WILSON Aaron	Water Conservation	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		Orders		
877.2	WILSON Aaron	Framework & FMU's	Support in part	I support the concept and structure of the FMUs and the outlining of water management issues but the W&L plan needs to describe how the limit setting process will take place and under what method the wider community will be involved in this process. I encourage council to adopt the collaborative approach to the limit setting process.
877.3	WILSON Aaron	Partnership between ES and Ngai Tahu Ki Murihiku	Support in part	The W&L Plan needs to outline a mechanism with which iwi values and wider community values are found or ascribed through a collaborative process.
877.4	WILSON Aaron	National Policy Statements	Support in part	I support the adoption of the three operative National Policy Statements, but only on the proviso that they be applied to the W&L plan in a truly collaborative process.
880.1	WILSON Shannon	Framework & FMU's	Support in part	I support the concept and structure of the FMUs and the outlining of water management issues but the W&L plan needs to describe how the limit setting process will take place and under what method the wider community will be involved in this process. I encourage council to adopt the collaborative approach to the limit setting process.
880.2	WILSON Shannon	Partnership between ES and Ngai Tahu Ki Murihiku	Support in part	The W&L Plan needs to outline a mechanism with which iwi values and wider community values are found or ascribed through a collaborative process.
880.3	WILSON Shannon	National Policy Statements	Support in part	I support the adoption of the three operative National Policy Statements, but only on the proviso that they be applied to the W&L plan in a truly collaborative process.
880.4	WILSON Shannon	Water Conservation Orders	Support	Retain.
895.2	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Introduction	Support	Retain the explanation of the NES for contaminated land.

### Issues - Water quality

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
43.1	BAKER Shane & SHAW Wendy	Water quality		Obtain better water quality information showing for our area.
103.3	BYARS A R & L J Trust	Water quality	Oppose	Delete ... “non-point source discharges from agriculture land are the most significant contributors of contaminants.”
191.1	DALE J M & K B	Water quality	Support	Environment Southland must consider the financial, economic and social repercussions to Southland of implementing policy to achieve water quality.
210.3	Director-General of Conservation	Water quality	Support in part	Retain Issues Water Quality with the following amendments to the second paragraph: Southland’s main catchments end with estuaries <u>while smaller catchments can have lagoons and lakes</u> which are <u>all</u> particularly sensitive to nutrient and sediment loads.
265.6	Federated Farmers of NZ (Southland Province)	Water quality - Paragraph 1	Support	Retain.
265.7	Federated Farmers of NZ (Southland Province)	Water quality - Paragraph 3	Support	Retain.
265.8	Federated Farmers of NZ (Southland Province)	Water quality - Paragraph 4	Oppose	Rewrite paragraphs 4 as follows: Non-point source discharges, such as stormwater in towns and leaching of contaminants from rural activities, are generally caused by rainwater carrying contaminants over or through the ground to surface waterbodies or groundwater, or by stream bank and bed erosion. <del>To date, there has been little management of non point source discharges, particularly from rural activities, which cumulatively contribute significant amounts of contaminants to waterbodies.</del> Despite some improvements being made, non-point source discharges from agricultural land are the most significant contributors of contaminants. Other types of land use, including industrial, urban, forestry, some landfills and horticulture also contribute contaminants.
265.9	Federated Farmers of NZ (Southland Province)	Water quality - Paragraph 5	Oppose	Rewrite paragraph 5 as follows: Land use intensification <del>also tends to</del> <u>may</u> increase the amount of contaminants entering water. <del>Therefore requiring appropriate</del> <u>Good management practices and mitigations to be put in place can be used</u> to ensure water quality <del>can be</del> <u>is</u> maintained or improved over time <del>when intensification occurs.</del>
277.8	Fonterra Co-operative Group Ltd	Water quality	Support	Retain the second sentence of the Issue statement pertaining to ‘Water Quality’.
279.1	Forest & Bird NZ	Water quality	Support with minor amendment	Delete the following paragraph: <del>Land use intensification also tends to increase the amount of contaminants entering water therefore requiring appropriate mitigations to be put in place to ensure water quality can be</del>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<del>maintained or improved over time when intensification occurs.</del> And add a statement describing the state of Southland's waterbodies and name those that are not achieving desired objectives.
570.1	MILLER R L & S J Farm Trust	Water quality Paragraphs 1, 3	Support	Retain.
570.2	MILLER R L & S J Farm Trust	Water quality Paragraph 5	Oppose	Change the wording from 'tends to' to 'may'. Add in the Good Management practices can also be used to ensure water quality is maintained or improved.
664.8	Real Journeys	Water quality		Include a reference to the effects of plant pests on water quality.
749.5	Southland Conservation Board	Water quality	Amend	The Board submits that the paragraph should be amended to read: "The Southland economy <u>and lifestyle</u> are based on rural production and servicing, fisheries, tourism, energy production and industrial processing, all of which rely on the availability of good quality water. <u>Maintenance of the conservation values of the Southland region also depends on the availability of water of high quality.</u> " <u>The condition and integrity of the conservation estate and of conservation values relies on appropriate water quality and water quantity.</u>
752.6	Southland Fish & Game Council	Water quality	Support Amend	Retain water quality issues with the following amendments: "Southland's main catchments end with estuaries <u>and its smaller catchments can end with estuaries, freshwater lakes and coastal lagoons and lakes</u> , which are <u>all</u> sensitive to nutrient and sediment loads. Degraded estuary, <u>lagoon and lake</u> water quality and habitats are particularly difficult and expensive to reverse. . . . . . The most significant point source discharges are major industrial and municipal discharges to the lower Maitava, <u>Makarewa</u> and Oreti Rivers and tributaries . . ."
752.7	Southland Fish & Game Council	Water quality	Support Amend	Add a statement to Water Quality issues describing the state of waterbodies in Southland and name those that are not achieving desired objectives, including meeting national bottom lines set out in the NOF.
768.3	STEVENSON Audrey	Water quality	Oppose	Amend. "non-point source discharges from agricultural land are the most significant contributors of contaminants". Where is the science behind that comment?
803.2	The Fertiliser Association of NZ	Water quality Page 14	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
803.3	The Fertiliser Association of NZ	Water quality Page 14	Support in part	Amend the Issue – Water Quality paragraph 5 as follows: Land use intensification <u>(both rural and urban)</u> also tends....
880.5	WILSON Shannon	Water quality	Support in part	Council needs to acknowledge the cumulative effects of European settlement on current land use and water quality. Council must broaden their current definition of intensification (which only covers dairying) and acknowledge that all residents of Southland have an impact on water quality. These points need to be reflected in the W&L plan. Council needs to engage with industry good bodies to ensure that current and potential mitigations are not compromised by any policies or rules contained in the W&L plan.

### Issues - Water quantity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
43.2	BAKER Shane & SHAW Wendy	Water quantity		Obtain better water quantity information for our area.
210.4	Director-General of Conservation	Water quantity	Support	Retain Water Quantity Surface Water and Groundwater Issues as notified.
576.1	MOIR Joseph	Water quantity	Neutral	Extend the dead line for stock exclusion to 2035-2040, or put it on a progressive approach excluding from larger waterbodies first making our way to all water bodies by 2035.
664.9	Real Journeys Ltd	Water quantity		Include reference to industries and activities which rely on good quality water.
749.6	Southland Conservation Board	Water quantity	Support	Retain.
752.8	Southland Fish & Game Council	Water quantity	Support	Retain.

### Issues – Surface water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.5	Director-General of Conservation	Surface water	Support	Retain Water Quantity Surface Water and Groundwater Issues as notified.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
249.2	Ernslaw One Ltd	Surface water	Amend	Incorporate the following principle as agreed in the First Land and Water Forum report, specifically Recommendation 131 (page 15), that: c. allocation of water should start at the boundaries of the waterbody, surface or groundwater – that is, not rainfall on land. Allocation will still need to manage for land use effects on water availability and on water quality, in concert, at the catchment level d. water allocation methods should not pick winners based on land use, e.g. constraining forestry to enhance water supplies for other productive sectors e. water use efficiency criteria should apply to all users, not just those under a new regime.
265.10	Federated Farmers of NZ (Southland Province)	Surface water Paragraph 2	Oppose in part	Include a reference for the statement that as at March 2015 more than 50% of the primary surface water allocation thresholds had been allocated in the majority of the region and explain how this has been determined.
622.3	P F Olsen Ltd	Surface water	Amend	Incorporate the following principle as agreed in the First Land and Water Forum report, specifically Recommendation 131 (page 15) that: c. allocation of water should start at the boundaries of the waterbody, surface or groundwater – that is, not rainfall on land. Allocation will still need to manage for land use effects on water availability and on water quality, in concert, at the catchment level. d. water allocation methods should not pick winners based on land use, e.g. constraining forestry to enhance water supplies for other productive sectors. e. water use efficiency criteria should apply to all users, not just those under the new regime.
731.1	SMITH Barry	Surface water Page 15		Wording changed to reflect the highly modified system from the Manapouri (former) outlet (Pearl harbour) and to the south including the Mararoa Weir.
752.9	Southland Fish & Game Council	Surface water	Support	Retain.

### Issues - Groundwater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
43.3	BAKER Shane & SHAW Wendy	Groundwater		Maintain the groundwater allocation already in place for this farm and unless there is a change in farming system or direction then the allocation should remain unchanged.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.6	Director-General of Conservation	Groundwater	Support	Retain Water Quantity Surface Water and Groundwater Issues as notified.
249.3	Ernslaw One Ltd	Groundwater	Amend	Incorporate the following principle as agreed in the First Land and Water Forum report, specifically Recommendation 131 (page 15), that: c. allocation of water should start at the boundaries of the waterbody, surface or groundwater – that is, not rainfall on land. Allocation will still need to manage for land use effects on water availability and on water quality, in concert, at the catchment level d. water allocation methods should not pick winners based on land use, e.g. constraining forestry to enhance water supplies for other productive sectors e. water use efficiency criteria should apply to all users, not just those under a new regime.
265.11	Federated Farmers of NZ (Southland Province)	Groundwater	Oppose in part	Paragraph 4 - Include a reference to the statement that at March 2015, less than 50% of the groundwater primary allocation thresholds had been allocation in the majority of the region and explain how this has been determined. And state a percentage rather than “less than 50%”.
622.4	P F Olsen Ltd	Ground Water	Amend	Incorporate the following principle as agreed in the First Land and Water Forum report, specifically Recommendation 131 (page 15) that: c. allocation of water should start at the boundaries of the waterbody, surface or groundwater – that is, not rainfall on land. Allocation will still need to manage for land use effects on water availability and on water quality, in concert, at the catchment level. d. water allocation methods should not pick winners based on land use, e.g. constraining forestry to enhance water supplies for other productive sectors. e. water use efficiency criteria should apply to all users, not just those under the new regime.
749.7	Southland Conservation Board	Groundwater	Amend	A further sentence is needed: <u>Research to further characterize and quantify the aquifer resource of the region is necessary, and in the meantime a precautionary approach to water allocation from aquifers needs to be taken.</u> The Plan notes that in March 2015 <i>less than 50% of the groundwater primary allocation thresholds had been allocated....</i> (But that) <i>some aquifers are fully allocated.</i> This points to a lack of knowledge about what is actually happening to the aquifers.
752.10	Southland Fish & Game Council	Groundwater	Support Amend	Retain Issues – Groundwater with the following amendment: “. . . As at March 2015, less than 50% of the groundwater primary allocation thresholds had been allocated in the majority of the region. Some aquifers are fully allocated in terms of the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				primary allocation thresholds or closes to this point. <u>Some aquifers, such as the Riversdale aquifer, are not identified as fully allocated but combined ground water extraction is resulting in surface water flows in spring fed streams not meeting minimum flows.</u>

### Issues - Soil resources

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.1	Ballance Agri-Nutrients	Soil resources	Support	Retain.
210.7	Director-General of Conservation	Soil resources	Support in part	Retain Issues Soil Resources as notified with the following new sentence added: <u>Inappropriate use of land can result in soil erosion or soil compaction.</u>
358.3	HASTIE Stephen	Soil resources	Support	Retain.
661.1	Ravensdown Ltd	Soil resources	Support	Retain.
749.8	Southland Conservation Board	Soil resources	Support	Retain.
752.11	Southland Fish & Game Council	Soil resources	Support Amend	Retain Issues – Soil resources with the following amendment: <u>“Inappropriate land use can create adverse effects on the quality and / or structure of the soil resource, including erosion and soil compaction.”</u>
803.4	The Fertiliser Association of NZ	Soil resources	Support	Retain.
880.6	WILSON Shannon	Soil resources	Support	Retain.

### Issues - River and lake beds

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.8	Director-General of Conservation	River and lake beds	Support in part	Retain Issues River and Lake Beds as notified with the following new sentence added after the first sentence in the first paragraph:  ...and food gathering. <u>Southland’s braided river beds are a nationally significant habitat for braided river birds, being a national stronghold for the threatened black billed gull and</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>important for the threatened black fronted tern and banded dotterel.</u>
288.3	Fulton Hogan Ltd & Southern Aggregates Ltd	River and lake beds	Support	Retain reference to the benefits of the use of river and lake beds and to gravel extraction activities within the issue.
664.10	Real Journeys Ltd	River and lake beds		Define the extent margins of a lake or river beds.
749.9	Southland Conservation Board	River and lake beds	Amend	Include the words <u>wetlands, lagoons and fresh water estuaries</u> in the wording of the issue.
752.12	Southland Fish & Game Council	River and lake beds	Support Amend	Retain Issues – River and lake beds with the following amendment: “River beds (including beds of streams and modified watercourses) and lake beds have a wide variety of values, including ecological, heritage, cultural and spiritual values, with rivers and lakes used for a range of recreational and cultural activities, including walking, fishing, <u>game bird hunting</u> , boating and food gathering.”
880.7	WILSON Shannon	River and lake beds	Support	Retain.

### Issues - Indigenous biodiversity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
192.2	DALE P T & S B Trust	Indigenous Biodiversity	Oppose	Delete.
210.9	Director-General of Conservation	Indigenous biodiversity	Support in part	Retain Issues Indigenous biodiversity as notified with the following amendments: In the first paragraph amend the third sentence to read: ...and provision of <del>ecological</del> <u>ecosystem</u> services <u>including protection of soil, reduction of flood peaks and the maintenance of stream flow during droughts.</u>
249.4	Ernslaw One Ltd	Indigenous biodiversity	Amend	L&W Plan to reference Council's Regional Policy Statement on Biodiversity (once adopted).
265.12	Federated Farmers of NZ (Southland Province)	Indigenous biodiversity	Oppose	Delete section and delete references to biodiversity in the Plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.2	Forest & Bird NZ	Indigenous biodiversity	Support with minor amendment	Amend Issue – Indigenous biodiversity as follows: There continues to be substantial impacts on ecosystems and <u>fragmentation and losses of significant indigenous biodiversity for a variety of reasons, including: vegetation clearance, non point source contamination, wetland drainage, lagoon openings, domestic stock, predators and weeds.</u> The most significant losses in indigenous habitat and biodiversity have occurred in lowland and coastal environments where most of the original indigenous vegetation has been lost.  Other wetlands are on private land and little is known about their health, values and use. <del>Land use change leads to conflict between productive use of land, including wet areas, and protecting habitats and biodiversity</del>
354.2	HARPUR George	indigenous biodiversity	Support	I support ES taking over this operation however this task can be varied and complex and needs to be under the control of an experienced rural versed officer.
749.10	Southland Conservation Board	Indigenous biodiversity	Amend	Include a paragraph on <u>aquatic weeds</u> and their adverse effect on biodiversity.
752.13	Southland Fish & Game Council	Indigenous biodiversity	Support Amend	Retain Issues – Indigenous biodiversity and include: <u>Wetlands are used for a range of recreational and cultural values, including walking, fishing, game bird hunting, boating and food gathering.</u>
877.5	WILSON Aaron	Indigenous biodiversity	Support in part	Re write to say, “Land use change may sometimes lead to a conflict between productive use of land, including wet areas, and protecting habitats and biodiversity.”
880.8	WILSON Shannon	Indigenous biodiversity	Support in part	Council needs to recognise the historic and cumulative effects of European settlement on indigenous biodiversity and wetlands in Southland. This needs to be reflected in the W&L plan.
880.9	WILSON Shannon	Indigenous biodiversity	Support in part	Re-write to say. “Land use change <u>may sometimes</u> lead to a conflict between productive use of land, including wet areas, and protecting habitats and biodiversity.”

### Physiographic zones

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.2	ADAMS A J & P G	Physiographic zones	Amend	Provide accurate maps for each farm, take into account varying management and stock types.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
11.1	Agribusiness Consultants Ltd	Physiographic zones		We recommend waiting until the Physiographic tool has a proven accuracy and offering the public the opportunity to consider it as a regulatory tool with this accuracy publicised. When matters of property rights and resource values are in question, a rushed approach should be discouraged.
19.3	Allison Family Farms Ltd	Physiographic zones		Confirm the accuracy of the Physiographic zones.
25.2	Ardel Dairies Ltd	Physiographic zones	Oppose	Remove physiographic zones from the plan until peer reviews have been completed first. Implement physiographic zones on a trial period outside of the plan to test accuracy over time.
26.3	Ardoyne Farm Dairys	Physiographic zones	Support in part Amend	There needs to be a process to challenge assignment of zones. There also needs to be a process included in the plan that details how individuals can appeal/contest the physiographic zones.
30.1	Avon Downs Ltd	Physiographic zones	Amend	Amend to ensure they use current soil mapping.
32.2	B D Farm Trust	Physiographic zones	Support Amend	Physiographic zones require an independent Peer Science Review with full public exposure.
32.3	B D Farm Trust	Physiographic zones	Support Amend	Include new provision: Any land holding which has been allocated an incorrect zone by ES and then proves it is impacted by a mistake in allocation, ES will pay for the cost of the evidence requiring the change and any economic costs occurred by the entity.
33.1	BACON V M	Physiographic zones	Support in part Amend	A rule added to the plan so landowners can seek a reclassification of incorrect physiographic zones. This could include, that a landowner notifies the council of incorrect physiographic zones on their property, council arranges for independent investigation, if the consultant finds the physiographic zone was correctly classified then it stays the same, if the consultant finds the physiographic zone was incorrectly classified then Environment Southland would amend the maps relating to that part of the property.
34.1	BAIRD A J & L S	Physiographic zones	Amend	Need to have flexibility to change zones if different soil types are found, this process is not accurately defined now.
39.2	BAIRD N J & S A	Physiographic zones		How have these been determined? It appears in a number of areas that the areas are divided by roads, this appears very strange. Does ES have any scientific proof that certain farming practices on certain physiographic zones causes more damage than on other zones?
40.1	BAKER David	Physiographic zones	Oppose	Do more research to prove the zones are correct and don't bring them into the Plan until either limit setting or 2020



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.2	Balance Agri-Nutrients	Physiographic zones	Oppose in part	Provide an avenue for providing evidence (such as a farm soil survey, or bore logs) that could potentially re-define the zone, would be useful, and consistent with approaches being established elsewhere in the country. See original submission for detail.
49.2	BARCLAY Todd (Member of Parliament – Clutha Southland)	Physiographic zones		Information provided by this science is useful in the development of good management practices on farms, but I echo the concerns raised by local constituents and oppose the implementation of actions based on physiographic zones. An additional concern regarding the inclusion of physiographic zones in the Plan relates to the absence of a process to review the physiographic zone allocated to a landholding.
54.3	Bayswater Dairy Ltd	Physiographic zones	Support Amend	Include a documented process included in this Plan that details how individuals can appeal the physiographic zone/s that their landholdings have been allocated.
55.1	BEATON G J & V R Family Trust	Physiographic zones	Oppose	Delete physiographic zones from Environment Southland Water and Land Plan. Replace with best/good management practices.
56.3	BEATTIE Michael & Lynley	Physiographic zones	Support	The boundaries of particular zones on individual farms may need to be more accurately mapped.
62.2	Beef + Lamb NZ	Physiographic zones		Use physiographic information to inform discussions on catchment limits, farm plans and/ or resource consents.
62.3	Beef + Lamb NZ	Physiographic zones		<p>Either remove physiographic zone maps and associated specific rules from the plan and use them to inform Farm Environment Plans and any required resource consent.</p> <p>If not, then:</p> <p>Make all rules consistent across physiographic zones, using the least restrictive specifications. Insert a new rule to outline a process for amending physiographic zones, to the effect of:</p> <p><u>Rule 5 – investigating and amending physiographic zone(s)</u></p> <ul style="list-style-type: none"> <li>• <u>The landowner<sup>1</sup> requests an investigation into the physiographic zone(s) on their property, using a prescribed form.</u></li> <li>• <u>Council completes a desktop study of the property to see the likelihood of an incorrect classification.</u></li> <li>• <u>Council reports the result of the desktop study with landowner, within 20 working days of receiving the request.</u></li> <li>• <u>The Landowner may proceed with an on ground investigation. If an investigation is carried out, this must be completed by an independent third party, approved by the Council CEO.</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li><u>If the third party finds the physiographic zone was correctly classified, then Environment Southland may recover costs by invoicing the landowner for the on-ground investigation.</u></li> <li><u>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland must pay for the investigation, and amend the physiographic zone maps.</u></li> </ul> <p><sup>1</sup>owner as defined in <i>Property Law Act 2007</i></p>
67.1	Benmore Downs Ltd	Physiographic zones		Clarify the accuracy of Physiographic Zones.
75.1	BLACKMORE Neil	Physiographic zones	Oppose	Delay use until all information is available.
82.3	BLOMFIELD M J & K G Trust	Physiographic zones	Support	We support the use of physiographic zones for the classification of land types. We would like provision to define more accurately the boundaries of these particular zones on our own property.
87.1	Braemore Farms Ltd	Physiographic zones	Amend	Include a rule that provides for the reclassification of incorrect Physiographic Zones. A combination of physiographic and good farm management practices be encouraged. More science with a peer review be completed.
95.1	BROWN J M & C D	Physiographic zones		We request Environment Southland to come to our farm and ground truth the physiographic zone.
96.1	BROWNING Stuart	Physiographic zones	Neutral	There needs to be an acknowledgement in the plan that the zone boundaries are not completely accurate. There needs to be a simple no cost mechanism for zone boundaries to adjusted / improved at a farm level.
97.1	Brunel Peaks Ltd	Physiographic zones	Amend	Review zones for the submitters' properties.
102.2	Burwood Station Ltd	Physiographic zones	Support	I would like provision to define more accurately the boundaries of these particular zones on individual farms.
107.1	BYARS Richard	Physiographic zones	Oppose	Delete.
110.1	C P M Environmental	Physiographic zones	Neutral	I would seek that in the plan it is clearly stated that land owners/managers can question the quality of data over their property and be able to submit ground truthed/surveyed amendments for their properties.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
120.1	CARTER D G & B J	Physiographic zones	Oppose Amend	To enter into a process that will query the physiographic zones.
126.1	Cheviot Downs Ltd	Physiographic zones	Amend	Insert a new rule to provide for amending incorrect physiographics.
128.1	CHITTOCK Andrew & Diane	Physiographic zones		We would like to know how definitive these zones are and is there any options, if at some future point they are found to be incorrectly estimated. No 'Grandparenting', as expressed with physiographic areas this will limit future cropping/intensification options.
142.2	CLEARWATER G S & M A	Physiographic zones		The area of winter crop grazing should be calculated as a percentage of the total area.
144.1	CLEARWATER Sue	Physiographic zones	Oppose	Quite obviously the proposers of the "physiographic" zones don't have the resources to implement this system. Therefore I would propose Environment South throw out this system and perhaps follow some other council's methods of nitrogen limit setting.
148.1	CLEMENT Paul & Linda	Physiographic zones	Oppose	If a farm is multi-zoned, all zones should be farmed to that zone, not to one, most detrimental zone decided by unproven science.
150.2	CLIFFORD Mervyn & Judy-Ann	Physiographic zones	Oppose	Can we have re-classification if the landowner thinks these zones are incorrect, and who will pay for this and what will the cost be?
155.1	Coasthaven Farms Ltd AND Paterson Gavara Trust	Physiographic zones	Oppose	Have a process in place by which a landowner can challenge the zone they have been assigned while keeping costs to the landowner to a minimum.
157.1	COGHLAN K P & W A	Physiographic zones	Oppose	Please don't try and put my farm into physiographic zones when no one from ES has even put a foot on my property. I reserve the right under property law to run my farm and stock in a responsible way without heavy handed interference from bureaucrats seeking to criminalise us.
166.1	COPELAND Pete & Tanya	Physiographic zones		Allow landowners to map their farms by a suitably qualified person and provide a farm scale plan of expected physiographic zones.
169.1	Copper Valley Holdings Ltd	Physiographic zones	Oppose	Delete all physiographic zones except Alpine.
178.1	Crooks Dairy Ltd	Physiographic zones	Oppose	Remove the zones.
179.4	CROOKS Jonathan Ross & Sarah Jane	Physiographic zones		The maps of the physiographic zones should be referred to within the Plan but sit outside the Plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
179.5	CROOKS Jonathan Ross & Sarah Jane	Physiographic zones		Suggest that a stepped approach for implementation of the rules be proposed for Old Mataura zone. Phasing in the rules that affect Old Mataura by 2025 and permitted Forage Crop maximums for Old Mataura be stepped downwards each year towards the currently proposed permitted limit of 20Ha by 2025.
191.2	DALE J M & K B	Physiographic zones	Oppose	Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
191.3	DALE J M & K B	Physiographic zones	Oppose	Plan should be delayed to allow meaningful input from affected parties.
195.2	DAVIE Stuart	Physiographic zones	Neutral	I feel that the Physiographic mapping should remain outside the plan so that the above issues can be resolved i.e. peer review completed and the robustness and reliability of proposed zones can be verified.
196.1	DE BOER Frido	Physiographic zones	Oppose	Delete zoning or do more research of accuracy.
205.2	Dillon Ag Ltd (Chris Dillon)	Physiographic zones	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 Physiographic zones should be removed from the plan.
206.2	Dillon Ag Ltd (Rochelle Dillon)	Physiographic zones	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 Physiographic zones should be removed from the plan.
209.4	DIPROSE Dave	Physiographic zones	Neutral	Physiographic overstates the environmental impacts and understates the economic, cultural and community values. We need to have a more balanced approach in the plan in regards to physiographics/policy making.
210.10	Director-General of Conservation	Physiographic zones - Alpine	Support in part	<p>1. Retain the description of the Alpine Physiographic Zone as notified and add:  <u>Lateral drainage within the soils can transport nutrients in solution to the nearest water bodies. At present most of these waters have very low nutrients and helps maintain the health of Southland's alpine sourced rivers. With intensification of land use these waters will contain more nutrients. This lateral drainage can also, on steep slopes, act as a lubricated layer to facilitate mass movement of soil such as slumps.</u></p> <p>2. Retain Key transport pathways for contaminants as notified and add the following:</p> <ul style="list-style-type: none"> <li>• <u>Lateral drainage – with intensification of land use, nitrogen and phosphorous is discharged to streams.</u></li> <li>• <u>Mass movement of soil including slumps and other soil erosion with sediment</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>discharge to streams.</u>
210.11	Director-General Conservation	of Physiographic zones – Bedrock/Hill country	Support in part	<p>Retain the description of the Bedrock/ Hill Country Physiographic Zone as notified and add:  <u>Deep drainage can also occur where fine textured soils overlie more permeable aquifers or where steams directly recharge an aquifer. These are potentially significant transport pathways for nitrogen.</u></p> <p>Retain Key transport pathway for contaminants as notified and add the following:  <u>Deep drainage – nitrogen</u></p>
210.12	Director-General Conservation	of Physiographic zones – Central Plains	Support in part	<ol style="list-style-type: none"> <li>1. Retain the description of the Central Plains Physiographic Zone as notified and add:  <u>Natural bypass flow occurs when the clay soil has cracks. These cracks occur when the soil has a low moisture content. These soil cracks allow the passage of nutrients and microbes into the underlying groundwater or into artificial drainage.</u></li> <li>2. Retain Key transport pathways for contaminants as notified and add the following: <ul style="list-style-type: none"> <li>• <u>Natural bypass flows – nitrogen, phosphorous and microbes to groundwater.</u></li> </ul> </li> </ol>
210.13	Director-General Conservation	of Physiographic zones - Gleyed	Support in part	<ol style="list-style-type: none"> <li>1. Retain the description of the Gleyed Physiographic Zone as notified and add:  <u>Deep drainage can also occur in podsol soils in this physiographic unit. This is a significant transport pathway for phosphorous. In lakes and lagoons phosphorous can be a limiting nutrient for algal growth.</u></li> <li>2. Retain Key transport pathway for contaminants as notified and add the following:  <u>Deep drainage in podsols – phosphorous</u></li> </ol>
210.14	Director-General Conservation	of Physiographic zones – Lignite/marine terraces	Support in part	<p>Retain the description of the Lignite Bedrock/ Hill Country Physiographic Zone as notified and add:  <u>Deep drainage can also occur where fine textured soils overlie more permeable aquifers. These are potentially significant transport pathways for nitrogen.</u></p> <p>Retain Key transport pathway for contaminants as notified and add the following:  <u>Deep drainage – nitrogen</u></p>
210.15	Director-General Conservation	of Physiographic zones – Old	Support	Retain the description of the Old Matura Physiographic Zone and Key Transport Pathways of contaminants as notified.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		Mataura		
210.16	Director-General Conservation	of Physiographic zones - Oxidising	Support	Retain the description of the Oxidising Physiographic Zone and Key Transport Pathways of contaminants as notified.
210.17	Director-General Conservation	of Physiographic zones – Peat wetlands	Support	Retain the description of the Peat Wetlands Physiographic Zone and Key Transport Pathways of contaminants as notified.
210.18	Director-General Conservation	of Physiographic zones - Riverine	Support	Retain the description of the Riverine Physiographic Zone and Key Transport Pathways of contaminants as notified.
210.19	Director-General of Conservation	Physiographic Zone Policies		Retain the concept of physiographic zones but amend the policies to reflect actual water quality, its trends and consider the implications of land intensification on future water quality. The potential water quality outcomes should be analysed for their consistency with the water quality standards of this Plan and the Regional Coastal Plan. Particular emphasis is required on the sensitivity of water bodies and estuaries to the increased contaminants and the actual potential effects on users of these waters.
210.20	Director-General Conservation	of Physiographic Zone Descriptions and Policies (all)	Support in part	Amend the physiographic units to reflect the Council's science as outlined in Physiographics of Southland Part 3 and other relevant Council science. In particular it is essential to take into account the existing water quality data and trends and whether the water quality breaches or will breach in future this plans water quality objectives and standards. It is also essential to take into account the actual and potential effects of water quality degradation on values of Southland's waterbodies and estuaries.
210.21	Director-General Conservation	of Physiographic Zone Descriptions and Policies (All)	Support in part	Include provisions in this plan that manages the intensification of land use to reduce the losses of contaminants to waterbodies including groundwater and to coastal water.
214.3	Donald Farm	Physiographic zones	Oppose	I oppose the use of Physiographic zones as a basis for setting rules. I oppose the use of individual Physiographic zones to determine policies. <u>Recommend</u> areas of commonality, individual farm type, farm practice and management plans be the basis for what is allowed on any property.
219.3	DRUMMOND R G & J M	Physiographic zones	Support	Retain but we would like provision to define more accurately the boundaries of these particular zones on individual farms.
220.1	Drylands Farming Ltd	Physiographic zones	Oppose	We suggest that the physiographic zones sit outside of the PSWLP until such time as they can be validated. We seek that the Old Mataura Zone be removed altogether. We seek that the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				activity status can change if your zone can be proved/disproved.
221.1	DRYSDALE Family Trust	Physiographic zones	Oppose	We suggest that the physiographic zones sit outside of the PSWLP until such time as they can be validated. We seek that the Old Mataura Zone be removed altogether. We seek that the activity status can change if your zone can be proved/disproved.
224.2	DUFFY Paul	Physiographic zones		Allow independent analysis and different zone attributed to farm if found.
226.1	DUMBLETON D L & M	Physiographic zones	Amend	Those landowners who feel and have evidence that their land has been wrongly classified within the physiographic zones should be given the opportunity to conduct test pits and re-zone their land.
232.1	Dynamic Dairy Ltd	Physiographic zones	Oppose	I oppose the idea that my land has peat wetlands on my property.
249.5	Ernslaw One Ltd	Physiographic zones	Amend	Amend the Physiographic Zone Policies (page 26) to make reference to ESC mapping and then create new land use rules to apply in the Alpine and Hill Country zones (i.e. vegetation removal, soil disturbance cultivation & earthworks rules) in the ESC zones: Orange, Dark Orange and Red (of which there are very few of the latter in Southland). Describe the Erosion Susceptibility Classification Mapping in a new appendix.
258.3	Eyre Creek Ltd	Physiographic zones		<p>Do NOT use PZ's to support regulatory structures. Use a proven and established method, which has been used in a similar scenario where any negative impacts on BOTH farming and water quality are minimised in line with each other.</p> <p>Any method adopted needs to be independently, internationally and locally peer reviewed. Something like, but not limited to a combination of grand-parenting and the Overseer model which allows farmers to carry on as they are and to identify their 'state and trend' of nutrient management and mitigate or correct any potentially adverse negative effects accordingly.</p> <p>The regulation should be 'effects based', on a user pays scale. Farmers' inputs and outputs should be monitored and if one is leaking excessive nutrients then they should be helped to manage their system in the right direction. This is a more case by case basis approach where 'best practise' operations are incentivised.</p> <p>Make an allowance for PZ's to be challenged and changed using a pre-determined and robust process retrospectively to law changes at the request of the land occupier but NOT the regulator.</p>

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265.13	Federated Farmers of NZ (Southland Province)	Physiographic zones - Whole section	Oppose	Remove all references to physiographic zones from the Plan. And remove all restrictions on land use based on physiographic zones.
279.3	Forest & Bird NZ	Physiographic zone policies		Amend all policies to ensure they take an environmental bottom lines approach (maintain, improve where degraded) to activities affecting water quality.
285.2	FRASER Doug	Physiographic zones	Oppose	Physiographic modelling. Delete - base soil profile on specific testing of each individual farm.
286.2	Frew Farming Ltd	Physiographic zones	Oppose	Physiographics are a good guide, but only should be used once scientifically bold then they may be used in a consent process.
287.1	FREW Mervyn	Physiographic zones	Oppose	No specific decision requested.
290.1	G A Young & Co Ltd	Physiographic zones	Oppose	The physiographic zones should in the meantime sit outside the W and L plan. It is a prescriptive broad brush approach that won't necessarily improve water quality in a catchment.
292.1	G S & M A Clearwater Ltd	Physiographic zones	Support	Support relief of implementation of good management practice.
294.1	Gardyne Agriculture Ltd (Duncan Gardyne)	Physiographic zones	Oppose	Farmers best interests for the land at heart. Farmers should be able to implement good farming practices without zoning restrictions.
295.1	Gardyne Agriculture Ltd (Fred Gardyne)	Physiographic zones	Oppose	Farmers best interests for the land at heart. Farmers should be able to implement good farming practices without zoning restrictions.
296.1	GARDYNE G W & E L Trust & C K Gardyne Ltd	Physiographic zones	Amend	The zones should be recognised but only as background information. These should be removed from the Rules.
297.6	GARDYNE Hugh & Kathie	Physiographic zones		That the maps are presented separately for both soils and geology and only overlaid where they are relevant to current farm management practices. A clear explanation of potential land use and restrictions on land use is included where multi zones are present on individual properties.
299.4	GARDYNE John	Physiographic zones	Oppose	The physiographic zones sit outside the plan until the science is proven and boundaries are checked.
300.4	GARDYNE Jonathan	Physiographic zones	Oppose	I feel more research is needed as to how different physiographic zones react to different management practices from, urban, to dairy to cropping and extensive farming. (Alpine and peat may not need this as such, as there is limited land use for these areas.)



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313.1	GILLESPIE Maria	Physiographic zones	Amend	That a process is put in place to allow modification of the physiographic zoning after the Plan comes into effect, if the prior zoning/mapping of the land is incorrect, and that a process is put in place to allow for review of the zoning of physiographic land types on an individual basis.
335.2	GREER Robin	Physiographic zones		While in general I agree with breaking the region into Physiographic zones I believe that a land holder needs to be able to challenge the zoning of their property as there are areas that could be different to what the zones are saying. This needs to be able to be challenged without it being a big financial burden to the land holder.
339.3	GUNN Olivia	Physiographic zones	Support	We recommend that there is a documented process included in this Plan that details how individuals can appeal the physiographic zone/s that their landholdings have been allocated.
344.2	Hall Ag Ltd (Glenda Hall)	Physiographic zones	Oppose	Farmers best interests for the land at heart. They should be able to implement good farming practices without zoning restrictions.
345.2	Hall Ag Ltd (John Hall)	Physiographic zones	Oppose	Farmers best interests for the land at heart. They should be able to implement good farming practices without zoning restrictions.
345.3	Hall Ag Ltd (John Hall)	Physiographic zones	Oppose Amend	View it on a case by case basis through resource consent process.
347.1	HAMILL Mark & Deborah	Physiographic zones	Amend	Should only be used as an indication of the different zones. Farmers should be allowed the discretion to question zones if they become a limiting factor.
358.4	HASTIE Stephen	Physiographic zones	Oppose	We don't agree with the high rainfall allocation for all Bedrock/Hill country.
361.2	HBG AgriLimited	Physiographic zones	Oppose	The physiographic zones should not be part of any regulation prior to the public having sufficient time to analyse the validation and testing report for themselves. Individuals should have a formal process available to them to be able to challenge the zone that they have been assigned. This process must be documented in this Plan.
361.3	HBG AgriLimited	Physiographic zones		Clarify ruling for properties with mixed physiographic zones – allowance of up to 50 ha on any one contiguous landholding with a maximum Peat/Wetland or Old Mataura area of 20 ha.
371.2	HENDERSON Tracy	Physiographic zones	Oppose	Delete.
377.1	HODGE Lynda	Physiographic		There should be a date put on when this map is going to be actually set in stone.

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		zone maps		
378.1	HODGE Murray	Physiographic zones		There should be a date put on when the physiographic map is going to be actually set in stone.
381.1	HOLDER Wendy & Tom	Physiographic zones	Oppose	If classification is necessary way forward for ES then in-depth scientific classification of each property title is required. If classification of an area as non-dairy farming, then ES needs to make no exemptions to this, therefore no existing or proposed (as in the dairy hub) should be exempt. There cannot be exemptions, same for all.
386.4	Hopcroft Farms Ltd	Physiographic zones	Support in part Amend	I suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
387.2	HORRELL Andrew Russell	Physiographic zones	Amend	Provide a mechanism for farmers to contest the boundaries of the zones allocated to their farms. Include new science to the Physiographic zones policy as it becomes available.
389.1	HORRELL P J & J M	Physiographic zones		Add a clause to the plan that allows a physiographic zone to be revised and amended if incorrect. Ensure the process imposes minimal expense to landowners.
389.2	HORRELL P J & J M	Physiographic zones		I am concerned that non-complying status has been given to the Old Mataura and Peat Wetlands without the community limit setting process. Change the status of all non-complying zones to discretionary and then re-evaluate as part of the limit setting process.
399.1	HUMPHRIES Marie	Physiographic zones	Oppose	Complete an external review of the Physiographic zones with the possibility of increasing the amount of zones provided in the plan.
409.1	Independent Forestry Services Ltd	Physiographic zones	Oppose	Without prejudice we contest the Physiographic zoning which has been allocated to our property. We believe these to be incorrect and need modification to reflect the actual land types.
421.1	JAMES S T & K A Family Trust	Physiographic zones	Oppose	Implement good farming practices without zoning restrictions.
425.1	Jedburgh Station Ltd	Physiographic zones	Amend	Add clause to allow for zone changes at no expense to the farmer.
426.2	JOHNSTON Allan & Robina	Physiographic zones	Support in part	Support the idea of better qualifying data.
426.3	JOHNSTON Allan & Robina	Physiographic zones	Support in part	Clarify whether this zoning and the ES FMP will be able to assist and identify appropriate water storage dams on properties like ourselves to be more self-sufficient, reduce sediment, increase wildlife rather than water schemes that rate of return is more ludicrous?

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427.1	JOHNSTON Nigel & Mandy	Physiographic zones		Amend to clarify how you demonstrate if you have more than one zone over your whole farm.
429.1	JOYCE Nathan J & Julie L	Physiographic zones	Support	Retain.
433.2	Kapuka Dairies Ltd	Physiographic zones	Oppose	In the current proposal our zone – Peat wetland is classified as non-compliant. This should be changed to a permitted discretionary activity. Improve accuracy of physiographic zones.
437.3	KEMPTHORNE Robert	Physiographic zones	Oppose in part	Delete physiographic zones until more knowledge has been obtained.
439.1	KENNEDY Murray	Physiographic zones	Oppose	I would like to see these zones become a living document and changes to be made through resource consent.
440.2	KENT Rita	Physiographic zones	Oppose	Give an opportunity to review the land zoning. The zoning placed by ES will devalue the land owners property based on the restrictions for opportunity to farm the land profitability. Allow farmers with good management practices all ready in place to continue to operate their business. It is their individual right to decide how to make their business profitable and which farm practices they use.
444.1	KING Henry	Physiographic zones	Amend	Need to be accurate. Mitigate the ‘grey’ areas. This must be farm specific.
445.1	KING R M & M J	Physiographic zones	Support in part	Clarify whether a small section of Peat Zone on a farm determines the Rules for the entire property. We need to be able to change our farm classification if incorrect. We need to be able to individualise zones within the farm.
447.1	Kiwi Dutch Dairies Ltd (John van Vliet)	Physiographic zones		There should be a date put on the physiographic zones map stating when this map is going to be actually set in stone.
448.1	Kiwi Dutch Dairies Ltd (Lucy van Vliet)	Physiographic zones		There should be a date put on the physiographic zones map stating when this map is going to be actually set in stone.
451.3	Knockinnon Farm Trust	Physiographic zones	Amend	Include a documented process in the plan allowing individuals to appeal/contest the physiographic zones and boundaries of their land holdings.
453.1	KNOWLER Rohan	Physiographic zones	Support	Provide a more specific mapping of zones within individual farms.
458.1	L R & S J Hammond Ltd	Physiographic zones	Support	Allow farmers time to get the information and how it affects their farms. Good management practices can be written up. Keep them simple and user friendly. Try to keep written plans to a

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				minimum.
459.2	Lagore Enterprises Trust	Physiographic zones	Oppose	Need to see more flexibility for each land area used by current owners, management, and soil type. Take a case by case basis if a new consent is required. Due to the different zoning area peoples properties will be classified. People may already have extremely good systems in place for management of the current landing holding but new rules will predetermine their ability to choose how they manage their business. These are often skilled people who deserve to continue with current practises.
460.1	LAIDLAW Graham	Physiographic zones	Oppose	Oppose the physiographic zoning that has been allocated to our property.
464.1	Landpro Ltd	Physiographic zones	Oppose in part	We seek that a provision for landholders to challenge their physiographic zones is made in the PSWLP, and that if a zone can be successfully challenged that the activity status for any proposed activity is adjusted accordingly to the appropriate physiographic zone.
467.1	Lawrence Farms Ltd (Gavin Lawrence)	Physiographic zones	Oppose	Environment Southland should monitor individual farms to check environmental effects and use more robust science i.e. checking water sources on more areas. Old Mataura is said to be contained yet our farm has a number of springs. Why not test them?
467.2	Lawrence Farms Ltd (Gavin Lawrence)	Physiographic zones	Oppose	Assess each farm and its possible effects and base it on better science. The use of 'Grandparenting' is very unfair. Work needs to be done on the economic effects.
476.1	Lochhead Holdings Ltd	Physiographic zones	Amend	Amend to allow a farming entity with different zones to treat a sensitive physiographic zone as a separate area of the farm and not have to treat the whole farm as one zone.
482.3	Lower Aparima Catchment Group	Physiographic zones	Support in part Amend	We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
482.4	Lower Aparima Catchment Group	Physiographic zones	Oppose	Clarify ruling for properties with mixed physiographic zones – allowance of up to 50 ha on any one contiguous landholding with a maximum Peat/ Wetland or Old Mataura area of 20 ha.
482.5	Lower Aparima Catchment Group	Physiographic zones	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
487.1	M K H Farming Ltd	Physiographic zones		A future proposal to replace these PZ maps is for individual catchments to map all bores in their catchments and take ownership of all water testing, plotting trends, hotspots and trying to improve water quality. Therefore 90% of Bores need to be tested by these catchments groups

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				as it is obviously in their best interest to improve water quality.
499.1	MANN Jeffery	Physiographic zones	Amend	Take the property at 127 Riordan Road, Waipounamu, out of Old Mataura.
504.2	MARSHALL Lynette	Physiographic zones	Oppose	Submitter seeks better consideration of current land use, giving farmers ability to diversify in the future if economics and technology allows.
515.2	MCCROSTIE Ray	Physiographic zones	Oppose	Use physiographic zone information as an additional guide for farmers - not for regulation. From what we have observed on our farm, the boundaries indicated on the physiographic zone are NOT accurate. We have found that soil maps used in conjunction with information about the length of time each area has been developed is a more accurate guide to leaky soils etc.
517.1	MCDONALD Colin & Dot	Physiographic zones	Oppose	I would like to see more research done into this before it is implemented.
518.4	MCDONALD Stuart & HALDER Robyn	Physiographic zones		Must be viewed as work in progress and subject to alteration in Management Plans if soil type proves to be different.
519.2	MCDONALD W F & K M	Physiographic zones	Oppose	Do not include physiographic zones until thoroughly tested as 'fit for purpose' in the practical farming world. An environmental versus economic cost/benefit analysis is undertaken.
519.3	MCDONALD W F & K M	Physiographic zones	Oppose	Continue the 'good practice' model used in the past for whole (Rural and Urban) community.
520.1	MCELLIGOTT J W & T L	Physiographic zones	Oppose	Management in these areas is more important than the physiographic zones.
521.1	MCEWAN Trevor & Anthea	Physiographic zones	Support Amend	As an alternative I propose <ul style="list-style-type: none"> <li>• A rule added so landowners can seek a reclassification of incorrect physiographic zones.</li> <li>• Perhaps it could include <ol style="list-style-type: none"> <li>1. The landowner notifies the council of the incorrect zones on their property</li> <li>2. The council arranges for an independent investigation funded by the council.</li> <li>3. If the independent consultant agree with council it stays the same and if agree with the farmer the maps are amended to include that finding.</li> </ol> </li> </ul>
526.2	MCINTYRE Peter	Physiographic zones		There should be a process to assist farmers on boundaries of physiographic zones to define their properties accurately.
534.1	MCKEE Scott	Physiographic zones	Oppose	The mapping needs to be farm by farm basis.
535.2	MCKEE Tyler	Physiographic	Oppose	Scale map each farm.

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		zones		
537.1	MCKENZIE G & T Partnership	Physiographic zones		We believe that limitations to our farming practice should be only on the farming zone with the greatest land percentage. This will help simplify farming practices.
538.1	MCKENZIE Hayden	Physiographic zones		A rule added into the Plan so land owners can seek a reclassification of incorrect physiographic zones. This rule could include: <ul style="list-style-type: none"> <li>• The land owner notifies the council of incorrect physiographic zone(s) on their property</li> <li>• The council arranges for an independent investigation – i.e. a consultant completes the investigation funded by Council.</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same.</li> <li>• If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of my property.</li> </ul>
541.1	MCLEAN Campbell	Physiographic zones	Oppose	There should be a process that you can prove what physiographic zone you are in.
542.1	MCLEAN David	Physiographic zones	Oppose	Delete Physiographic Zones and perhaps follow some other council's methods of nitrogen limit setting.
547.1	MCMULLEN G F	Physiographic zones	Amend	Be able to change incorrect zones by consultant etc.
549.1	MCNAMARA Bevan	Physiographic zones	Oppose Amend	Need to be able to challenge the physiographic zones on my property, include in plan to be able to challenge zones.
551.1	MCPHAIL Glen	Physiographic zones	Support Amend	In principal I agree with zonings but a small part of our farm contains peat. Include a provision that explains how management will work on a farm with multiple zones.
552.1	MCPHAIL Neil	Physiographic zones	Support	I agree with using science to understand how water and nutrients travel through our soil structure. But there needs to be a process in which landowners are able to challenge where the borders of the zones lie. Also to be able to input new zones that are not there e.g. the Willowbank lignite deposit is not identified on the maps.
553.1	McPhelzo Trust (C G & M P Pullar)	Physiographic zones	Support in part	Amend to provide scope to reduce inaccuracies in translating the mapping science to the mapping scale.
553.2	McPhelzo Trust (C G & M P Pullar)	Physiographic zones	Support in part	Request that more time, research and consultation be applied to reach a system that is robust and meets ES and land user's objectives.

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553.3	McPhelzo Trust (C G & M P Pullar)	Physiographic zones	Support in part	<p>Add a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>The Council arranges for an independent investigation - i.e. a consultant completes the investigation funded by Council</li> <li>If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of the property.</p>
553.4	McPhelzo Trust (C G & M P Pullar)	Physiographic zones	Support in part	That ES align and integrate Physiographic Zones and methodologies into acceptable practices and permissible activities with other regions in NZ to ensure products, application rates, farming or business systems mirror what is acceptable NZ wide.
553.5	McPhelzo Trust (C G & M P Pullar)	Physiographic zones	Support in part	That ES adopt or integrate nationally or internationally accepted and proved methods/systems into the plan. EG ISO# type system.
554.2	McPhelzo Trust (Z, E & P Pullar)	Physiographic zones	Support in part	Amend to provide scope to reduce inaccuracies in translating the mapping science to the mapping scale.
554.3	McPhelzo Trust (Z, E & P Pullar)	Physiographic zones	Support in part	Request that more time, research and consultation be applied to reach a system that is robust and meets ES and land user's objectives.
554.4	McPhelzo Trust (Z, E & P Pullar)	Physiographic zones	Support in part	<p>Add a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>The Council arranges for an independent investigation - i.e. a consultant completes the investigation funded by Council</li> <li>If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of the property.</p>
554.5	McPhelzo Trust (Z, E & P Pullar)	Physiographic	Support in part	That ES align and integrate Physiographic Zones and methodologies into acceptable practices and permissible activities with other regions in NZ to ensure products, application rates,

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	Pullar)	zones		farming or business systems mirror what is acceptable NZ wide.
554.6	McPhelzo Trust (Z, E & P Pullar)	Physiographic zones	Support in part	That ES adopt or integrate nationally or internationally accepted and proved methods/systems into the plan. EG ISO# type system.
555.1	MCRAE Daryl & Ruth	Physiographic zones	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
556.1	MCRAE Joe	Physiographic zones	Oppose	As an alternative I propose to use the physiographic zones as a tool for education but not for enforcement until either the accuracy has been proven, or a better way of allocating zones is developed.
558.1	MCRAE Natalie	Physiographic zones	Support Amend	I support the use of different zones to determine risks for landowners but further testing should be undertaken to confirm accuracy of this tool. Add in a rule which allows landowners to seek reclassification of incorrect physiographic zones at the cost of ES. This could be by way of independent soil testing, and if the zone is incorrectly mapped this would be amended. There would also need to be a further rule to allow the landowners the ability to disagree with the independent soil testing.
560.1	MCRAE Tim & Justine	Physiographic zones	Oppose	Updated soil maps will give a better understanding of soil types and then future management of these.
564.4	Mid-Aparima Catchment Group	Physiographic zones	Support Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal the physiographic zone/s that their landholdings have been allocated.
569.1	MILLER R J Trust	Physiographic zones	Oppose	In the first instance we seek that the physiographic zones are outside the pSWLP until such time as they can be validated and ground truthed. We seek that the activity status may change if your zone can be proved/disproved.
570.3	MILLER R L & S J Farm Trust	Physiographic zones	Oppose	Do not restrict land use based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality.
580.1	MORRIS G G & R M Family Trust	Physiographic zones	Oppose	Compensation should be payable to those whose farm values are adversely affected by the implementation of new 'zones' on our land. We need to option to have evidence of boundaries provided by ES before plan can take effect.
583.1	MOSEBY Ryan	Physiographic zones	Amend	Develop a process for farmers to prove they do/do not have a particular zone on their property. This could also allow ES to improve accuracy of its records over time?



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597.1	NAPPER Mary & FINDLAY Allan	Physiographic Zone	Amend	We request suitable qualified scientists are made available, to visit sites where the landowner disputes that the physiographic zone is correct. This should be at no cost to the land owner.
603.2	Nithdale Station	Physiographic zones		If a farmer thinks the mapping is inaccurate then they could ask Environment Southland to arrange for this to be checked by an independent consultant (at ES's cost). Any changes required from this investigation to be made to existing classification.
619.2	Opio Milk Ltd	Physiographic zones	Support	We support the use of physiographic zones for the classification of land types but we would like provision to define more accurately the boundaries of these particular zones on individual farms.
622.5	P F Olsen Ltd	Physiographic zones	Support Amend	Amend the Physiographic Zone Policies to align references to erosion management to the NES-PF.
625.1	Parawa Ltd	Physiographic zones	Amend	Need to have flexibility to change zones if different soil types are found, this process is not accurately defined now.
627.2	PATERSON Ross	Physiographic zones	Amend	Do some testing and work with farmers to fine tune their on farm systems.
628.2	PATERSON Stephanie	Physiographic zones	Amend	Do some testing and work with farmers to fine tune their on farm systems, and allow some flexibility within the rules taking into consideration some of these variables.
641.1	POYNTZ-ROBERTS David	Physiographic zones	Amend	Need to be set as an on farm basis.
642.1	PREBBLE Lynden	Physiographic zones	Oppose Amend	A rule added into the plan so landowners can seek a reclassification of incorrect physiographic zone(s). This rule could include: The landowner notifies the council of the inaccuracies and the council arranges for the area to be remapped accurately.
643.1	PREBBLE Sandra	Physiographic zones	Oppose Amend	As an alternative I propose: A rule added into the plan so landowners can seek a reclassification of incorrect physiographic zone(s). This rule could include: The landowner notifies the council of the inaccuracies and the council arranges for the area to be remapped accurately.
651.1	PULLAR Logan Trust	Physiographic zones	Oppose	Soil profiles must be done on properties negatively affected, no consent required.
652.2	PULLAR Mary	Physiographic zones	Oppose	That scope is given to reduce inaccuracies in translating the mapping service to the mapping scale. That more time, research and consultation be applied to reach a system that is robust and meets ES and land users objectives. As an alternative I propose: A rule added into the plan so

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>landowners can seek a reclassification of incorrect physiographic zones. This could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation-i.e. a consultant completes the investigation funded by Council.</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same.</li> <li>• If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of my property. <ul style="list-style-type: none"> <li>(i) That ES align and integrate Physiographic Zones and methodologies into acceptable practices and permissible activities with other regions in NZ to ensure products, application rates, farming or business systems mirror what is acceptable NZ wide.</li> </ul> </li> </ul> <p>That ES adopt or integrate nationally or internationally accepted and proved methods/systems into the plan EG ISO# type system.</p>
659.1	Rathfriland Ltd	Physiographic zones	Oppose Amend	ES need to be very sure that the maps are accurate.
667.4	Riverfield farms Ltd	Physiographic zones	Amend	We recommend that the zones classifications are corrected to be the actual zones of the property. We do not support the current zoning and would like a process of appealing the zones to ensure they are fact. This needs to be done prior to accepting this plan with individual property owners.
668.3	Riverdale Dairies Ltd	Physiographic zones	Support	We would like provision to define more accurately the boundaries of these particular zones on individual farms.
670.1	ROBB Tony & Jill Family Trust	Physiographic zones	Amend	Provide provisions to provide clarity around the restrictions of the land when there is a mixture of physiographic zones.
681.1	Rockytommy Farming Ltd	Physiographic zones	Oppose	In the first instance we seek that the Physiographic Zones are outside of the PSWLP, until such time as they can be validated and ground truthed.
681.2	Rockytommy Farming Ltd	Physiographic zones	Oppose	We seek the removal of the Old Mataura Zone altogether.
681.3	Rockytommy Farming Ltd	Physiographic zones	Oppose	We seek that the activity status may change if your zone can be proved/disproved.

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684.2	ROSE David	Physiographic zones	Oppose	Remove Physiographic Zones from the plan.
690.1	ROSS Warren	Physiographic zones	Support	Retain.
691.1	Rossland Farming Ltd	Physiographic zones	Support	Retain.
693.2	ROY Bevan	Physiographic zones	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
701.1	RUYGROK N C & N (Nicholas Ruygrok)	Physiographic zones		There should be a date put on when this map is going to be actually set in stone.
702.1	RUYGROK N C & N (Nicolazina Ruygrok)	Physiographic zones		There should be a date put on when this map is going to be actually set in stone.
704.2	Ryan Farms 2006 Ltd	Physiographic zones	Amend	Retain physiographic zones but would like provision for individual farms to challenge accuracy of boundaries on these particular zones affecting them.
712.2	Seaview Trust & Oraka Farms Ltd	Physiographic zones	Oppose	Oppose the use of physiographics as a regulatory tool in this plan.
712.3	Seaview Trust & Oraka Farms Ltd	Physiographic zones		Physiographics used only to inform GMP and no rules to be based on certain physiographic zones.
712.4	Seaview Trust & Oraka Farms Ltd	Physiographic zones	Oppose	Oppose the use of physiographics for specific rules in the plan. Physiographics and maps should sit outside the plan alongside GMPs.
712.5	Seaview Trust & Oraka Farms Ltd	Physiographic zones		Allow for the limit setting process to take into account economic, social, cultural and environmental impacts on an equal basis with physiographics helping to inform this process.
715.1	SHALLARD David & Kim	Physiographic Zones	Oppose	I am surprised that I have got land that has been classed as Old Matura physiographic zone. Some of the characteristics of Old Matura don't apply to my farm i.e. free draining soil and clay sub soil.
716.1	SHALLARD Mark & Tania	Physiographic zones	Oppose Amend	As an alternative I propose: A rule added into the Plan so landowners can seek a reclassification of incorrect physiographic zones which could include notifying the council of incorrect physiographic zone; the Council

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				arranges for an independent investigation; a consultant completes the investigation funded by Council If the consultant finds the physiographic zone was correct, it stays the same. If the consultant finds the physiographic zone was incorrect, then Environment Southland would amend the maps relating to that part of my property.
717.1	SHALLARD Murray & Jo	Physiographic zones	Oppose	I oppose the physiographic mapping of a large part of our property. Based on topography, geology and the need for soil profiling, I cannot agree in regards to our place with what has been classified "Old Mataura".
724.1	SHIRLEY Wayne & Gaye	Physiographic zones	Oppose	The council arranges for an independent person to check zones at no cost to the farmer.
728.1	Slope Point Farms Ltd	Physiographic zones	Oppose	In a farm specific environmental plan, areas of the farm can be managed to gain the same result. Flexibility on specific farms with regards to topography etc. is vital.
733.2	SMITH Hamish & Karen	Physiographic zones		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
738.1	Snowdon Downs	Physiographic zones	Oppose	We should be able to implement good farming practices without zoning restrictions.
747.2	Southern Star Farms Ltd	Physiographic zones	Oppose	Use physiographic zone information as an additional guide for farmers, not for regulation.
748.1	Southern View Ltd	Physiographic zones	Support	Retain.
749.11	Southland Conservation Board	Physiographic zones	Support	Maintain the physiographic zoning as the basis for the Plan.
749.12	Southland Conservation Board	Physiographic zones	Amend	Exclude the CMA from the Plan OR include "The Sea" as a separate physiographic zone.
752.14	Southland Fish & Game Council	Physiographic zones	Support	Retain the introductory text and descriptions of the nine physiographic zones (Alpine, Central Plains, Gleyed, Bedrock / Hill Country, Lignite-Marine terraces, Old Mataura, Oxidising, Peat Wetlands and Riverine.
759.1	Springlands Group Ltd	Physiographic zones	Oppose in part	Clarify the management of multiple Physiographic zones in the PSWLP.
760.1	St Patricks Farms Ltd	Physiographic zones	Support	Define an uncertainty zone i.e. +/- 50 or 100 metres to the interface between zones. Define identical but separated zones to be treated as one composite or two defined areas in

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	management plans.
760.2	St Patricks Farms Ltd	Physiographic zones	Support Amend	I would appreciate an on-farm consultation with ES staff to confirm the zonal classifications with ES staff to confirm the zonal classifications are accurate and productive to a better outcome given the farms geology.
761.4	STALKER Hanna & Callum	Physiographic zones	Support	We recommend that there is a documented process included in this Plan that details how individuals can appeal the physiographic zone/s that their landholdings have been allocated.
770.1	STEWART Family Trust (David Stewart)	Physiographic zones	Oppose	Change to stocking rate limits: e.g. sheep and beef farming to be under 15su/ha.
777.1	STRATFORD Chris & Lynsey	Physiographic zones	Neutral	<p>It is difficult to know whether to support the use of physiographic zones. The peer review has only been undertaken on parts of the physiographic approach. Our biggest concern is that the physiographic risks are not linked to "effects based" policy. We advocate for an effects based plan.</p> <p>We are also concerned that there is no mention in the plan of a way for farmers to demonstrate that they are in a different physiographic zone than indicated on the physiographic maps. We believe there should be a process for challenging this.</p>
786.1	SUTHERLAND Kevin & Ann	Physiographic zones	Support Amend	<p>Include a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation – i.e. a consultant completes the investigation funded by Council</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of my property.</p>
787.2	SUTHERLAND Richard	Physiographic zones	Oppose	Need scientific testing on farm to see what needs to happen. All farms may need different plans.
790.2	TAIT G R & J E & Waikawa Valley Trust	Physiographic zones	Oppose	Clarify what zone rules apply when there are multiple zones on a property.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
792.2	TAYLER Matthew	Physiographic zones		Properties should be defined by their largest physiographic zone.
797.5	Nga Runanga and TRONT	Physiographic zones		Apply consistent use of physiographic zones throughout the Plan as a strong basis for the rationale for the rules structure. This includes providing for large scale consents that are not required to prepare management plans, or are not captured by provisions relating to land use rules within the Plan, for example mining, milk processing factories, sewerage discharges, chemical storage and forestry.
798.1	TEMPLETON Luke	Physiographic zones	Support in part Amend	I recommend that physiographic zones are removed from the plan and are referred to in the Farm management plans.
799.2	TEMPLETON Peter	Physiographic zones	Support in part Amend	I recommend that the "physiographic zone" system live outside of the LAWA plan like the good management practices do. This means that they can be more easily and quickly updated with the latest science and avoid lengthy and costly plan changes. I recommend that physiographic zones are removed from the plan and are referred to in the Farm management plans.
802.2	The 254 Partnership & Gerken Family Trust	Physiographic zones	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
803.5	The Fertiliser Association of NZ	Physiographic zones	Support	Retain.
809.1	Thornhall Holdings Ltd	Physiographic zones	Amend	The boundary line of Old Mataura physiographic zone I wish to challenge on my property.
822.1	Tremaine Farming Partnership	Physiographic zones	Oppose	The physiographic zone maps should not be included in the plan until proper and extensive scientific research into all zones and their locations can be carried out. The Old Mataura zone should also be removed. Landowners should have the ability to prove/disprove their zone if the PZ maps are introduced as they will make a huge impact on the economic position of many who are in/not in certain zones.
826.1	TURNER Jonny	Physiographic zones	Oppose	Delete.
827.3	TURNER Paul & Kayleen	Physiographic zones	Support	Retain but we would like provision to define more accurately the boundaries of these particular zones on individual farms.
828.1	Twin Farm Ltd	Physiographic zones	Amend	Remove the blanket rule and look at each application on a case by case basis, including management of 'problem areas' and restriction of effluent application. This should be included in resource consent overseen by Environment Southland.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
830.3	Upper Aparima Catchment Group	Physiographic zones	Support	Define more accurately the boundaries of these particular zones on individual farms.
832.1	VAN GOOL Raewyn	Physiographic zones	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
833.3	VAN ROOIJEN Marcel	Physiographic zones	Support	We support the use of physiographic zones for the classification of land types but we would like provision to define more accurately the boundaries of these particular zones on individual farms.
834.2	VAN ROSSUM Winy & Maarten	Physiographic zones	Oppose	We oppose the use of the physiographic science as a tool. Once the science has been proven to be accurate we would accept the use of the physiographic science. Our recommendation would be to provide a detailed report on the accuracy of the physiographic zone science to the public.
840.3	W & B Clarke & Son Ltd	Physiographic zones		There needs to be an ability somehow for the boundaries and locations of the physiographic units to be adjusted in the future, and the ability for land holders to challenge the information in relation to the physiographic zoning of their property if they believe the maps are incorrect. We believe the physiographic zone maps should not be included within the final Land and Water Plan but instead be a separate standalone document that is referred to in the plan but can be further developed and altered over time.
843.1	Waikaia Plains Ltd	Physiographic zones	Support Amend	Define an uncertainty zone i.e. +/- 50 or 100 metres to the interface between zones. Define if identical but separated zones to be treated as one composite or two defined areas in management plans. I would appreciate an on farm consultation with ES staff to confirm the zonal classifications are accurate and conducive to a better outcome given the farms geology.
844.1	Waitea Dairies Ltd	Physiographic zones	Oppose	We think that more research should be done into the zone types.
848.2	WARD Patrick	Physiographic zones		Include a provision that allows questioning of a farms physiographic zone and changing of these if necessary.
852.1	WEIR Pauline & Andrew	Physiographic zones	Support	Support physiographic zones for identifying risks but it is not accurate for my property.
854.1	WELLER Grant & Bernie	Physiographic zones	Support Oppose	Remove physiographic zoned maps from regulations until farmers have time to verify at a farm scale their accuracy and have a method to change zones if inappropriate. Meanwhile can use physiographic zone risk alongside other mitigations within a Farm Environment Plan.
856.3	West Range Farms Ltd	Physiographic	Amend	I agree in principle, but feel the boundaries on the map may not reflect what the soil type really is. Would prefer some sort of provision for science and good farming practice, to more

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Bronwyn Chamberlain)	zones		accurately determine what each farm can do.
857.3	West Range Farms Ltd (Derek Chamberlain)	Physiographic zones	Amend	I agree in principle, but feel the boundaries on the map may not reflect what the soil type really is. Would prefer some sort of provision for science and good farming practice, to more accurately determine what each farm can do.
859.1	WHITE Family Trust	Physiographic zones	Amend	We oppose the use of physiographic areas as a regulatory tool.
859.2	WHITE Family Trust	Physiographic zones	Amend	Peat wetlands boundaries need reassessing.
859.3	WHITE Family Trust	Physiographic zones	Amend	Environment Southland needs to take a realistic and common sense approach to any new rulings affecting farmer's livelihoods and the economy of the region and the country.
861.4	WHITE John Copeland	Physiographic zones	Support in part Amend	We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
865.1	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Physiographic zones	Amend	A stable physiographic map showing the zones. As over the last 6-7 months these zones have been changed if you look back at old maps.
868.7	Wilkins Farming Ltd	Physiographic zones	Oppose	<p>Do NOT use PZ's to support regulatory structures. Use a proven and established method, which has been used in a similar scenario where any negative impacts on both farming and water quality are minimised in line with each other.</p> <p>Any method adopted needs to be independently, internationally and locally peer reviewed. Something like, but not limited to a combination of grand-parenting and the Overseer model which allows farmers to carry on as they are and to identify their 'state and trend' of nutrient management and mitigate or correct any potentially adverse negative effects accordingly.</p> <p>Use a method which is under pinned by a case by case methodology, judging each situation on its merits, such as but not limited to the Overseer model.</p> <p>Make an allowance for PZ's to be challenged and changed using a pre-determined and robust process retrospectively to law changes at the request of the land occupier but not the regulator.</p>
872.2	William J Watt Consulting Ltd	Physiographic zones	Support	Retain, basing the plan on the physiographic zones and the 'earth science' approach used to identify and define the zones.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
874.1	WILLIAMSON Rodney	Physiographic zones	Amend	Need to have flexibility to change zones if different soil types are found, not accurately defined now.
875.3	Willowbank Farms 2015 Ltd & Avondale Dairies	Physiographic zones	Support	Retain the use of physiographic zones but we would like provisions to define more accurately the boundaries of these particular zones on individual farms.
880.10	WILSON Shannon	Physiographic zones	Support in part	I support in part Physiographic zones but I oppose the use of PZ as it is set out in the W&L plan.
889.2	WRIGHT David	Physiographic zones	Oppose	Delete. Base soil profile on specific testing of each individual farm.
892.1	YOUNG A R & R B Partnership (Andrew Young)	Physiographic zones		A rule should be added to the plan so landowners can request a reclassification of incorrect physiographic zones.
893.1	YOUNG A R & R B Partnership (Roseanne Young)	Physiographic zones		A rule should be added to the plan so landowners can request a reclassification of incorrect physiographic zones.
894.1	YOUNG Robert	Physiographic zones	Oppose	I would like to see provision to appeal for reclassification of physiographic zones at the council's expense.
895.3	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Physiographic zones		<p>Ensure the physiographic zone policies are clear and useable by removing significant duplication and clarifying the policies apply to agricultural activities in the referenced zones, not other activities or other physiographic zones. This could be achieved by revising the policies as follows:</p> <p><b>Physiographic Zone Policies</b></p> <p><b>Policy 4 - <u>Avoid, remedy or mitigate erosion and adverse effects on water quality from contaminants arising from agricultural activities in each of the physiographic zones listed below by requiring implementation of good management practices and, when assessing resource consent applications and preparing or considering resource management plans, having particular regard to transportation of contaminants via the following pathways in the respective zones:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Alpine – Overland flow</u></b></li> <li>• <b><u>Central Plains – Artificial drainage and deep drainage</u></b></li> <li>• <b><u>Gleyed, Bedrock/Hill Country, Lignite Marine Terraces – Artificial drainage and</u></b></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>overland flow</u></p> <ul style="list-style-type: none"> <li>• <b><u>Old Mataura</u></b> – Deep drainage</li> <li>• <b><u>Oxidising</u></b> – Deep drainage, overland flow, and artificial drainage</li> <li>• <b><u>Peat Wetlands</u></b> – Artificial drainage, deep drainage, and lateral drainage</li> <li>• <b><u>Riverine</u></b> – Deep drainage and overland flow</li> </ul> <p><b>Note to plan users:</b> There are no specific policies for other defined physiographic zones in the region, for instance the Urban Area physiographic zone.</p> <p><b><u>Alpine physiographic zone</u></b></p> <p><b><u>Policy 5</u></b> – Prohibit dairy farming, and intensive winter grazing strongly discourage the granting of resource consents for cultivation.</p> <p><b><u>Old Mataura and Peat Wetland physiographic zones</u></b></p> <p><b><u>Policy 6</u></b> – Strongly discourage the granting of resource consents for additional dairy farming of cows and additional intensive winter grazing</p>

### Region-wide objectives – General comments

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
191.4	DALE J M & K B	General	Support	Environment Southland must consider the financial, economic and social repercussions to Southland of implementing these objectives.
197.2	DEVINE Wade	General		All aquifers should be for the public good/benefit excepting that landowners have the right to use water in a sustainable manner for their agriculture use.
197.3	DEVINE Wade	General	Oppose	There should be only one plan that people have to abide by and as in previous comments there should be clarity of one purpose and objective. The one that does not best serve the intent of this plan should be struck out and if that is the RMA so be it. The right to allow proper farm drainage should not be circumvented by this plan or the RMA.
437.4	KEMPTHORNE Robert	General	Oppose in part	Provide a clarification on what objectives take precedence over others.
483.1	Ludell Ltd	General	Support	Environment South must consider the financial, economic and social repercussions to Southland of implementing these objectives.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
611.1	NZ Defence Force	General	Amend	Include provision for 'strategic facilities' in the objectives of the SLWP.
712.6	Seaview Trust & Oraka Farms Ltd	General	Amend	Provide equal consideration to environmental, social, cultural and economic considerations in the plan objectives
752.15	Southland Fish & Game Council	General	Support	Objectives not covered specifically below are supported by Fish & Game. Fish & Game seeks that they are retained as set out in the pWLP.
752.16	Southland Fish & Game Council	General		<p>Insert sub-headings into the Region-Wide Objectives of the pWLP as follows:</p> <ul style="list-style-type: none"> <li>a) Ki uta ki tai: mountains to sea;</li> <li>b) Beneficial use and development;</li> <li>c) Maori relationships;</li> <li>d) Natural character, form and function;</li> <li>e) Water quality;</li> <li>f) Biodiversity, aquatic ecosystem health and mahinga kai;</li> <li>g) Sites with significant values;</li> <li>h) Air;</li> <li>i) Soil;</li> <li>j) Land use;</li> <li>k) Discharges;</li> <li>l) Water allocation; and</li> <li>m) Coastal management.</li> </ul>
797.6	Te Runanga o Ngai Tahu	General	Support	Retain objectives as proposed.
815.1	Timpany Investments Ltd	General	Amend	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 up such that they are genuinely achievable for the industry.

## Objective 1

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.1	Aratiatia Livestock Ltd	Objective 1	Support	Retain.
48.3	Ballance Agri-Nutrients	Objective 1	Support	Retain.
108.1	BYTHELL Jesse	Objective 1	Support	Retain.
190.6	DairyNZ	Objective 1	Support Amend	Re-order the objective to more clearly recognise that land use is the driver behind water quality and water quantity effects.
209.5	DIPROSE Dave	Objective 1	Oppose	Recognise that the connecting between surface water and ground water is indirect and is influenced by other elements outside the landholding boundaries.
210.22	Director-General of Conservation	Objective 1	Support	Retain.
265.14	Federated Farmers of NZ (Southland Province)	Objective 1	Support	Retain.
279.4	Forest & Bird NZ	Objective 1	Support Amend	Amend Objective 1 as follows: Land and water and associated ecosystems are <u>sustainably</u> managed as integrated natural resources, recognising the connectivity between surface water and groundwater, and between freshwater, land and the coast.
661.2	Ravensdown Ltd	Objective 1	Support	Retain.
749.13	Southland Conservation Board	Objective 1	Support	Retain.
752.17	Southland Fish & Game Council	Objective 1	Support Amend	Retain Objective 1 as notified with the following amendment to be consistent with Objective C1 of the NPS-FWM: “Land and <u>fresh</u> water and associated ecosystems are <u>sustainably</u> managed as integrated <u>and connected</u> natural resources <u>from the mountains to the sea</u> , recognising the <u>connectivity interactions</u> between surface water and groundwater, and between freshwater, land, <u>associated ecosystems</u> and the coast.”
803.6	The Fertiliser Association of NZ	Objective 1	Support	Retain.
832.2	VAN GOOL Raewyn	Objective 1	Support	Retain.
895.4	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil	Objective 1	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Companies)			

## Objective 2

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.2	Alliance Group Ltd	Objective 2	Support in part	Retain objective, and include additional policies and rules to better support this objective.
24.2	Aratiatia Livestock Ltd	Objective 2	Support	Retain.
25.3	Ardel Dairies Ltd	Objective 2	Oppose	The first priority before any rule changes are brought in should be to robustly study and report on the economic effects to rural business and the wider rural community.
32.4	B D Farm Trust	Objective 2	Support Amend	Amend objective 2 by adding... “and this will be recognisable in the development of all policy and regulation.”
48.4	Ballance Agri-Nutrients	Objective 2	Support in part	Amend to read: <b>Objective 2</b> Water and land is <u>sustainably managed to</u> recognised <u>and provide for</u> <del>as an enabler</del> of the economic, social and cultural wellbeing of the region.
81.2	BLAKELY Hamish & Hannah	Objective 2		The studies currently being undertaken around this need to be completed and data analysed first.
108.2	BYTHELL Jesse	Objective 2	Support	Retain.
189.1	Dairy Holdings Ltd	Objective 2	Support	Retain
197.4	DEVINE Wade	Objective 2	Support	There needs to be real consideration to utilise the freshwater resource that flows into Deep Cove to be sold for the public benefit. Significant royalties would need to be imposed on the commercial gain. Processes should be in place which encourages local Councils planning to allow pumped grey waste water to connect to centralised sewage networks instead of restricting the size of lots. This would still require onsite septic tanks as the primary treatment of household sewerage.
205.3	Dillon Ag Ltd (Chris Dillon)	Objective 2	Support	Support but for ES to stand up and be honest that this economic work has not been completed and not allow this plan to be adopted until further work has been done.
206.3	Dillon Ag Ltd	Objective 2	Support	Support but for ES to stand up and be honest that this economic work has not been completed and not allow this plan to be adopted until further work has been done.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Rochelle Dillon)			
209.6	DIPROSE Dave	Objective 2	Support	Retain.
210.23	Director-General of Conservation	Objective 2	Support	Retain.
220.2	Drylands Farming Ltd	Objective 2	Oppose	We would like to see, and believe under the RMA that it should be included, a study on the economic and social impacts for the region and each physiographic zone.
221.2	DRYSDALE Family Trust	Objective 2	Oppose	We would like to see, and believe under the RMA that it should be included, a study on the economic and social impacts for the region and each physiographic zone.
265.15	Federated Farmers of NZ (Southland Province)	Objective 2	Support in part	Delete and replace Objective 2 with:  <u>Soil and freshwater are managed for their long-term sustainable use for a variety of activities, including the production of food and fibre, to enable people and communities in Southland to provide for their economic, social and cultural well-being.</u>  <u>People have flexibility and choice to modify, change and develop land for farming purposes within a framework of long-term sustainable use.</u>
277.9	Fonterra Co-operative Group Ltd	Objective 2	Support	Retain.
279.5	Forest & Bird NZ	Objective 2		Delete Objective 2 and replace with: <u>Within sustainable limits, the use of land for the economic, social and cultural wellbeing of the region is provided for</u>
288.4	Fulton Hogan Ltd & Southern Aggregates Ltd	Objective 2	Support	Retain.
292.2	G S & M A Clearwater Ltd	Objective 2	Support	Retain.
299.5	GARDYNE John	Objective 2	Support	Include economic, social and cultural wellbeing of the region.
300.5	GARDYNE Jonathan	Objective 2	Oppose	This should be the first objective.
342.1	H W Richardson Group	Objective 2	Support in part	Retain objective, and include additional policies and rules to better support this objective.
358.5	HASTIE Stephen	Objective 2	Support	Include a lot more emphasis on supporting farmers, in helping build their businesses and drive economic growth and who are the key providers of the Southland economy. Not demand

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				more regulation at our own costs.
449.1	KiwiRail Holdings Ltd (KiwiRail)	Objective 2	Support	Retain.
570.4	MILLER R L & S J Farm Trust	Objective 2	Support	Amend Objective 2 to read: Water & Land quality are managed for their long term sustainability for all activities, including farming, to ensure the economic, social and cultural wellbeing of the people of Southland.
583.2	MOSEBY Ryan	Objective 2	Support	Retain.
640.2	Pourakino Catchment Group	Objective 2	Support	Retain.
661.3	Ravensdown Ltd	Objective 2	Support	Retain.
664.11	Real Journeys Ltd	Objective 2		Amend Objective 2: Water and land is recognised as <del>an enabler</del> <u>a significant provider</u> of the economic, social and cultural wellbeing of the region.
666.3	Rimu Grasslands Ltd & Leicester Downs Ltd	Objective 2	Support	Retain.
681.4	Rockytommy Farming Ltd	Objective 2	Amend	Have an objective to maintain economic status, which will require an economic study on the region and individual areas.
682.1	Rokenwai Farming Ltd	Objective 2	Amend	Have an objective to maintain economic status, which will require an economic study on the region and individual areas.
711.1	SCOTT G D & M M	Objective 2	Support	Retain.
712.7	Seaview Trust & Oraka Farms Ltd	Objective 2	Support	Retain.
725.1	Silver Fern Farms Ltd	Objective 2	Support	Retain.
749.14	Southland Conservation Board	Objective 2	Support	Retain.
752.18	Southland Fish & Game Council	Objective 2	Support Amend	Amend Objective 2 to include recognition of ecosystem health, ecological processes, natural character, and ecosystem services to the economic, social, and cultural aspects within Objective 2 and the need for sustainable limits to provide for these. In addition, include human health as an aspect within Objective 2.
792.3	TAYLER Matthew	Objective 2		An additional objective (or objective 2 sufficiently modified) to ensure the costs imposed on

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				landowners are not prohibitively expensive or disproportionate to the environmental gains envisaged.
802.3	The 254 Partnership & Gerken Family Trust	Objective 2		ES to stand up and be honest that this work has not been completed and not allow this plan to be adopted until further work has been done.
803.7	The Fertiliser Association of NZ	Objective 2	Support in part Amend	Amend Objective 2 as follows: Water and land is <u>sustainably managed to</u> recognised <u>and provide for</u> <del>as an enabler</del> of the economic, social and cultural wellbeing of the region.
810.2	Three Rivers Catchment Group (TRCG)	Objective 2	Support	Retain.
832.3	VAN GOOL Raewyn	Objective 2	Support	Retain.
877.6	WILSON Aaron	Objective 2	Support in part	Robust economic impact reports need to be commissioned with regards to PZs and the policies and rules contained in this plan.
880.11	WILSON Shannon	Objective 2	Support in part	Robust economic impact reports need to be commissioned with regard to PZs and the policies and rules contained in this plan.
895.5	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 2	Support	Retain.

### Objective 3

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.3	Aratiatia Livestock Ltd	Objective 3	Support	Retain.
108.3	BYTHELL Jesse	Objective 3	Support	Retain.
210.24	Director-General of Conservation	Objective 3	Support	Retain.
265.16	Federated Farmers of NZ (Southland Province)	Objective 3	Oppose	Delete Objective 3 and replace with: <u>The relationship of Ngāi Tahu whānui and their customs and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga is recognised and provided for; and Ngāi Tahu are able to exercise kaitiakitanga over freshwater resources.</u>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
299.6	GARDYNE John	Objective 3	Oppose	Delete.
661.4	Ravensdown Ltd	Objective 3	Support in part	Ravensdown seeks for the intent of Objective 3 to be retained, with an indication included that meeting the targets and limits in the Plan will achieve these outcomes.
742.2	South Island Eel Industry Association	Objective 3	Amend	Ngai Tahu Objective 3 needs to be changed as follows: To manage activities that adversely affect the habitats of taonga species, identified in Appendix M.
749.15	Southland Conservation Board	Objective 3	Support	Retain.
752.19	Southland Fish & Game Council	Objective 3	Support	Retain.
832.4	VAN GOOL Raewyn	Objective 3	Support	Retain.
895.6	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 3	Support	Retain.

#### Objective 4

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.4	Aratiatia Livestock Ltd	Objective 4	Support	Retain.
108.4	BYTHELL Jesse	Objective 4	Support	Retain.
209.7	DIPROSE Dave	Objective 4	Support	Retain.
210.25	Director-General of Conservation	Objective 4	Support	Retain.
265.17	Federated Farmers of NZ (Southland Province)	Objective 4	Oppose	Delete Objective 4 and replace with: <u>The relationship of Ngāi Tahu whānui and their customs and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga is recognised and provided for; and Ngāi Tahu are able to exercise kaitiakitanga over freshwater resources.</u>
390.2	Horticulture NZ	Objective 4	Support in part	Amend Objective 4 as follows: Tangata whenua values and interests are identified <u>through the FMU process</u> and reflected in the management of freshwater and associated ecosystems.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
661.5	Ravensdown Ltd	Objective 4	Support in part	Ravensdown seeks for the intent of Objective 4 to be retained, with the following amendment: "Tāngata whenua values and interests are <del>identified and reflected</del> <u>recognised</u> in the management of freshwater and associated ecosystems".
749.16	Southland Conservation Board	Objective 4	Support	Retain.
752.20	Southland Fish & Game Council	Objective 4	Support	Retain.
832.5	VAN GOOL Raewyn	Objective 4	Support	Retain.
877.7	WILSON Aaron	Objective 4	Support in part	Definition of 'tangata whenua' to include all residents and peoples of Southland, not just in reference to iwi.
880.12	WILSON Shannon	Objective 4	Support in part	Definition of 'tangata whenua' to include all residents and peoples of Southland, not just in reference to iwi.
895.7	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 4	Support	Retain.

## Objective 5

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.5	Aratiatia Livestock Ltd	Objective 5	Support	Retain.
108.5	BYTHELL Jesse	Objective 5	Support	Retain.
210.26	Director-General of Conservation	Objective 5	Support	Retain.
265.18	Federated Farmers of NZ (Southland Province)	Objective 5	Oppose	Delete Objective 5 and replace with: <u>The relationship of Ngāi Tahu whānui and their customs and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga is recognised and provided for; and Ngāi Tahu are able to exercise kaitiakitanga over freshwater resources.</u>
299.7	GARDYNE John	Objective 5	Oppose	Delete.
437.5	KEMPTHORNE Robert	Objective 5	Oppose in	Provide Maori to English interpretation.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	
749.17	Southland Conservation Board	Objective 5	Support	Retain.
752.21	Southland Fish & Game Council	Objective 5	Support	Retain.
832.6	VAN GOOL Raewyn	Objective 5	Support	Retain.
895.8	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 5	Support	Retain.

## Objective 6

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.3	Alliance Group Ltd	Objective 6	Oppose in part	Amend the objective as follows: There is no reduction in the quality of freshwater <u>within freshwater management units, and water in estuaries and coastal lagoons</u> ; by: (a) maintaining the <u>overall</u> quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and (b) improving the <u>overall</u> quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities.
24.6	Aratiatia Livestock Ltd	Objective 6	Support	Retain.
48.5	Ballance Agri-Nutrients	Objective 6	Support in part	Amend to read: <b>Objective 6</b> There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; <del>and</del> <u>or</u> (b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities <u>to the point of being over-allocated</u> .

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
81.3	BLAKELY Hamish & Hannah	Objective 6		Environment Southland must consider and include provisions to control the environmental impact that urban built up areas are having on the water quality in Southland as well as the farming areas that have diversified.
108.6	BYTHELL Jesse	Objective 6	Support	Retain.
156.1	COCKBURN Grant & Rachel	Objective 6	Amend	<p>Explain what a ‘significant’ and significant meaningful’ degradation means in terms of percentage change.</p> <p>Water quality trends need to be clear and kept in context. Need clarification on the ‘trends’ of water quality in the Waiau Catchment.</p> <p>Explore any tools that Meridian could use to help manage N levels in our waterways, via the Mararoa Weir.</p> <p>Establish a level of N (annual average) in the main rivers that allows some increase on the existing levels and is still well within ‘clean’ levels. We can fix P &amp; e coli in the water and improve those levels.</p>
190.7	DairyNZ	Objective 6	Support Amend	Amend to provide a more logical connection between the primary and secondary objectives.
210.27	Director-General of Conservation	Objective 6	Support in part	<p>Retain Objective 6 as notified with the following addition:</p> <p>There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by:</p> <p>(a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and</p> <p>(b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities <u>to protect their significant values as outlined in the NPSFWM and in the coastal environment NZCPS and have at least a 10% improvement in water quality by 2025.</u></p>
220.3	Drylands Farming Ltd	Objective 6	Support	Farmers who are already practicing best Management need more recognition from the council.
221.3	DRYSDALE Family Trust	Objective 6	Support	Farmers who are already practicing best Management need more recognition from the council.
249.6	Ernslaw One Ltd	Objective 6	Amend	Design / align the policy with current Central Government work on water allocation and pricing, while making provision for Iwi rights and interests in freshwater. As per the Land & Water Forum recommendation 131e, ensure that water use efficiency criteria apply to all users, not just those under a new regime.
265.19	Federated Farmers of NZ (Southland Province)	Objective 6	Support in part	<p>Rewrite Objective 6:</p> <p><u>Water quality in freshwater bodies, estuaries, and coastal lagoons is maintained where it is in a</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>healthy state and improved where it is degraded.</u>
277.10	Fonterra Co-operative Group Ltd	Objective 6	Oppose	Amend the objective to clarify: (a) How the concept of “degraded” will apply for the purpose of this objective, including a definition of that term as it relates to groundwater and surface water; and (b) Whether the intent of the objective is to maintain or improve overall water quality.
279.6	Forest & Bird NZ	Objective 6	Support	Retain the Objective 6 as notified with the following addition: There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and (b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities <u>to protect their significant values as outlined in the NPSFWM and in the coastal environment NZCPS and have at least a 10% improvement in water quality by 2025.</u>
283.1	Foveaux Investments Ltd	Objective 6	Amend	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 measurable). 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 the industry.
288.5	Fulton Hogan Ltd & Southern Aggregates Ltd	Objective 6	Oppose	Amend Objective 6 to tolerate some deterioration of water quality where, after a consideration of all effects associated with the activity, it is deemed appropriate. Objective 6 There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by: (a) <u>managing the quality of water in waterbodies supplying estuaries and coastal lagoons; and</u> ( <del>a</del> b) maintaining the quality of water in <del>waterbodies</del> , estuaries and coastal lagoons, where the water quality is not degraded; and ( <del>b</del> c) Improving the quality of water in <del>waterbodies</del> , estuaries and coastal lagoons, that have been degraded by human activities.
330.1	Gore District Council, Invercargill City Council and Southland District Council	Objective 6	Oppose Amend	Objective 6 is clarified to address the concerns raised by the Councils submission: Objective 6: There is no <u>overall</u> reduction in the quality of freshwater, and water in estuaries and coastal lagoons by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities <u>To ensure freshwater objectives are met</u>
355.1	HARRIS David	Objective 6	Amend	Alter first paragraph to aim to improve water quality.
477.3	Longwood Properties Ltd	Objective 6	Amend	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 measurable). This would enable both historic and present day levels of water quality to be assessed to evaluate performance. Timeframes for any measurable should be set such that they are genuinely achievable for industry.
622.6	P F Olsen Ltd	Objective 6	Amend	There needs to be an added objective that recognises that allocation mechanisms need to be based on fundamental principles that recognise that change is needed, that such change will occur within an overriding framework of “natural capital” baselines and market transfer mechanisms applying to all directly involved participants in a landscape.
661.6	Ravensdown Ltd	Objective 6	Support in part	Ravensdown seeks for the intent of Objective 6 to be retained, and amended to read: “There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality it is not degraded; and b)——improving the quality of water in waterbodies, estuaries and coastal lagoons, that have <u>where it has</u> been degraded by human activities.”
749.18	Southland Conservation Board	Objective 6	Support	Retain.
750.2	Southland District Council	Objective 6	Amend	Amend the wording as follows: “There is no reduction in the <u>overall</u> quality of freshwater, and water in estuaries and coastal lagoons, by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and (b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities: <u>to ensure freshwater objectives are met.”</u>
752.22	Southland Fish & Game Council	Objective 6	Oppose	Retain Objective 6 as notified with the following amendments: “There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons,

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>by:</p> <ul style="list-style-type: none"> <li>(a) Maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality <del>is</del> <u>has not degraded by human activities</u>; and</li> <li>(b) Improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities, <u>including land use and discharge activities, to protect their significant values and achieve a minimum of a 10% improvement in the levels of the following water quality parameters compared to the year 2010 by the year 2020:</u> <ul style="list-style-type: none"> <li>i. <u>Microbial contaminants;</u></li> <li>ii. <u>Nitrate;</u></li> <li>iii. <u>Phosphorus; and</u></li> <li>iv. <u>Visual clarity; and</u></li> <li>v. <u>Sediment.”</u></li> </ul> </li> </ul> <p>Insert a schedule into the pWLP identifying where the quality of water in surface waterbodies, estuaries and coastal lagoons have been degraded by human activities in Southland. This should include a regional summary of water quality monitoring results using both state (where it currently is) and trends (how it has changed over time).</p> <p>The above assessment should include an assessment against the bottom lines in the National Objectives Framework (NOF) outlined in the NPS-FWM and the Drinking-Water Standards for New Zealand 2005 (revised 2008). Council has already undertaken this work in relation to the current compulsory values set by NOF (secondary contact, nitrate toxicity, ammonia toxicity and planktonic algae) and the drinking water nitrate standard (11.3mg/L) for the period 2009 - 2014.<sup>2</sup></p>
757.3	Southwest Properties Ltd	Objective 6	Amend	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

<sup>2</sup> See Environment Southland publication ‘Water Quality in Southland – Water and Land 2020 & Beyond’.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				are genuinely achievable for industry.
803.8	The Fertiliser Association of NZ	Objective 6	Support in part Amend	Amend Objective 6 as follows: There is no reduction in the quality of freshwater, and water in estuaries and coastal lagoons, by: (a) maintaining the quality of water in waterbodies, estuaries and coastal lagoons, where the water quality is not degraded; and (b) improving the quality of water in waterbodies, estuaries and coastal lagoons, that have been degraded by human activities <u>to the point of being over-allocated.</u>
813.3	Tihaka Farms	Objective 6	Amend	We suggest that this objective is 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 measurable should be set such that they are genuinely achievable for industry.
820.1	TOPHAM Jeanette	Objective 6	Amend	Change the wording “degraded by human activities” to ...improving the quality of water in waterbodies, estuaries and coastal lagoons, to meet as a minimum, secondary human contact levels or...to meet NOF levels for water quality.
832.7	VAN GOOL Raewyn	Objective 6	Support	Retain.
842.3	Waihoaka Holdings Ltd	Objective 6	Amend	We suggest that this objective is 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 measurable should be set such that they are genuinely achievable for industry.
895.9	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 6	Support	Retain.

## Objective 7

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.7	Aratiatia Livestock Ltd	Objective 7	Support	We believe that ES in concert with Central Government should actively seek alignment of the timeframe required by the National Statement on Freshwater (2025) and the Resource Consent for Meridian to divert all but 16 cubic m/sec (at the Mararoa weir) for hydro generation for the



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Manapouri Hydro Scheme (2031). Only with this alignment can the integrated management of the freshwater resource within the catchment, which we applaud, be achieved.
48.6	Ballance Agri-Nutrients	Objective 7	Support in part	Amend to read: Objective 7 Any further over-allocation of freshwater (water quality and quantity) is avoided and existing over-allocation is phased out in accordance with timeframes established <u>collaboratively with affected parties</u> under Freshwater Management Unit processes. Any similar amendments with like effect. Any similar amendments with like effect.
108.7	BYTHELL Jesse	Objective 7	Support	Retain.
210.28	Director-General of Conservation	Objective 7	Support in part	Retain Objective 7 as notified with the following addition: Any further allocation of freshwater (water quality and quantity) is avoided and existing over-allocation is phased out in accordance with timeframes established under the Freshwater Management Unit process <u>or sooner when considering resource consent applications for activities in catchments where poor water quality is having significant adverse effects on the values of water bodies and coastal water ecosystems in that catchment.</u>
249.7	Ernslaw One Ltd	Objective 7	Amend	Design / align the policy with current Central Government work on water allocation and pricing, while making provision for Iwi rights and interests in freshwater. As per the Land & Water Forum recommendation 131e, ensure that water use efficiency criteria apply to all users, not just those under a new regime.
265.20	Federated Farmers of NZ (Southland Province)	Objective 7	Oppose	Delete Objective 7 and include it instead as a new policy as follows: <del>Any further over-</del> Over-allocation of freshwater (water quality and quantity) is avoided and <u>any</u> existing over-allocation is phased out in accordance with timeframes established under Freshwater Management Unit processes.
279.7	Forest & Bird NZ	Objective 7	Support	Retain.
299.8	GARDYNE John	Objective 7	Oppose	Delete.
337.5	Growplan Ltd	Objective 7	Oppose	Why can't over-allocation be just shut down? – It is after all a loan from an already depleted and finite resource.
381.2	HOLDER Wendy & Tom	Objective 7		Delete paragraphs 2 & 3. Reassess over allocation of water on existing properties and pull back consents to within a standard for all properties and land titles, at the time of implementation of this plan. ES stand up and take action in reversing consents overallocating H <sub>2</sub> O supply. Reduce overallocated supply.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
622.7	P F Olsen Ltd	Objective 7	Amend	There needs to be an added objective that recognises that allocation mechanisms need to be based on fundamental principles that recognise that change is needed, that such change will occur within an overriding framework of “natural capital” baselines and market transfer mechanisms applying to all directly involved participants in a landscape.
661.7	Ravensdown Ltd	Objective 7	Support in part	Ravensdown seeks for the intent of Objective 7 to be retained, and amended to read: “Any further over-allocation of freshwater quantity and of contaminants that may affect freshwater quality ( <u>including nutrient, sediments and pathogens</u> ) is avoided and existing over-allocation is phased out in accordance with timeframes established under Freshwater Management Unit processes.”
749.19	Southland Conservation Board	Objective 7	Support	Retain.
752.23	Southland Fish & Game Council	Objective 7	Support in part	Retain Objective 7 as notified with the following amendment: “Any further allocation of freshwater (water quality and quantity) is avoided and existing over-allocation is phased out in accordance with timeframes established under the Freshwater Management Unit process <u>or earlier when considering consent applications for land use and / or discharge activities.</u> ”
803.9	The Fertiliser Association of NZ	Objective 7	Support in part Amend	Amend Objective 7 as follows: <del>For Any further over-allocation of freshwater (water quality and quantity) the purpose of the RMA will be met by avoiding over-allocation and phasing out is avoided and existing over-allocation is phased out</del> in accordance with <u>the objectives and</u> timeframes established under the Freshwater Management Unit processes.
832.8	VAN GOOL Raewyn	Objective 7	Support	Retain.
895.10	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 7	Amend	Ensure Objective 7 recognises that it is appropriate to provide for water takes for temporary construction dewatering activities, including in over allocated aquifers. This could be achieved by amending Objective 7 as follows:  <b>Objective 7</b> <del>Any</del> <u>With the exception of abstraction of groundwater for monitoring purposes or temporary construction dewatering activities,</u> further over-allocation of freshwater ( <del>water quality and quantity</del> ) is avoided and existing over-allocation is phased out in accordance with timeframes established under Freshwater Management Unit processes.

## Objective 8

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.8	Aratiatia Livestock Ltd	Objective 8	Support	Retain.
32.5	B D Farm Trust	Objective 8(b)	Support Amend	Objective 8(b) amended to: “is improved to an agreed level by the catchments community.”
48.7	Ballance Agri-Nutrients	Objective 8	Support in part	Amend to read: <b>Objective 8</b> a) The quality of water in aquifers that meet both the Drinking-Water Standards for New Zealand 2005 (revised 2008) and any freshwater objectives, <del>including for connected surface waterbodies, established under Freshwater Management Unit processes</del> is maintained; and b) The quality of water in aquifers that have been degraded by land use and discharge activities (with the exception of those aquifers where ambient water quality is naturally less than the Drinking-Water Standards for New Zealand 2005 (revised 2008)) is improved.
108.8	BYTHELL Jesse	Objective 8	Support	Retain.
210.29	Director-General of Conservation	Objective 8	Support in part	Retain the Objective 8 as notified with the following amendment: (a) The quality of water in aquifers that meet both the Drinking-Water Standards for New Zealand 2005 (revised 2008), <u>the water quality standards for Spring Fed creeks in Appendix E</u> and any freshwater objectives, including for connected surface waterbodies, established under Freshwater Management Unit processes is maintained; ....
265.21	Federated Farmers of NZ (Southland Province)	Objective 8	Oppose in part	Replace Objective 8 with: <u>Groundwater aquifers are a sustainable source of high quality drinking water, support the base flows in lowland, springfed streams, and, where accessible and appropriate, are a reliable source of irrigation water.</u>
277.11	Fonterra Co-operative Group Ltd	Objective 8	Oppose	Amend Objective 8, to clarify what the term “degraded” means in the context used and, in particular: (a) Whether its means “does not meet the Drinking Water Standards for New Zealand 2005 (revised 2008)”; and (b) What freshwater objectives are being referred to?

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.8	Forest & Bird NZ	Objective 8	Support	Retain.
300.6	GARDYNE Jonathan	Objective 8	Oppose	Combine with Objective 6. Also on that note in certain areas water quality cannot be improved e.g. where it comes out of the bush. How are we to improve on that?
337.6	Growplan Ltd	Objective 8	Amend	This section is extremely vague. Where standards are cited/mentioned an outline of the standards should be published here so we don't have to read (or buy) yet another document!
661.8	Ravensdown Ltd	Objective 8	Support in part	Ravensdown seeks for the intent of Objective 8 to be retained, and re-written to read: <u>“The quality of water in aquifers is maintained where it currently meets standards and any freshwater objectives, and is improved where degraded by land use and discharge activities.”</u>
749.20	Southland Conservation Board	Objective 8	Support	Retain.
752.24	Southland Fish & Game Council	Objective 8	Support in part	Retain Objective 8 as notified with the following amendment: a) “The quality of water in aquifers that meet <del>both</del> the Drinking-Water Standards for New Zealand (revised 2008), <u>the standards set for surface water bodies classified as “Spring Fed” in Appendix E “Water Quality Standards”</u> and any freshwater objectives, including for connected surface waterbodies, established under Freshwater Management Unit processes is maintained; and b) The quality of water in aquifers that have been degraded by land use and discharge activities (with the exception of those aquifers where ambient water quality is naturally less than the Drinking-Water Standards for New Zealand 2005 (revised 2008) is improved <u>through land use and discharge provisions and rules to ensure compliance with the Drinking-Water Standards for New Zealand 2005 (revised 2008) by the year 2020.</u> ”
803.10	The Fertiliser Association of NZ	Objective 8	Support	Retain.
820.2	TOPHAM Jeanette	Objective 8	Amend	Define the word improve i.e. “improved to meet NOF levels for water quality”
832.9	VAN GOOL Raewyn	Objective 8	Support	Retain.
895.11	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 8	Support	Retain.

## Objective 9

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
13.1	All In Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
17.4	Alliance Group Ltd	Objective 9	Support	Retain.
24.9	Aratiatia Livestock Ltd	Objective 9	Support	We are unsure of the appropriate regulatory mechanism but we would consider ES has an overarching responsibility to review and monitor the adequacy of the biosecurity management plans the Statutory Managers (Fish and Game) of the freshwater fisheries, have in place.
26.4	Ardoyne Farm Dairys	Objective 9	Oppose	Equal importance should be given to the four pillars - social, economic, water quality and quantity.
48.8	Ballance Agri-Nutrients	Objective 8	Support	Retain.
54.4	Bayswater Dairy Ltd	Objective 9	Oppose	Amend to give equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
108.9	BYTHELL Jesse	Objective 9	Support	Retain but clarify the definition ‘reasonable needs for economic wellbeing’ regarding water abstraction.
154.1	Coastal Plains Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
209.8	DIPROSE Dave	Objective 9	Support	Retain.
210.30	Director-General of Conservation	Objective 9	Support	Retain.
265.22	Federated Farmers of NZ (Southland Province)	Objective 9	Oppose in part	Delete Objective 9 and split into two new Objectives: Objective X <del>Provided (a) is met, w</del> Water is available both instream and out-of-stream to support the reasonable needs of people and communities to provide for their social, economic and cultural wellbeing.  Objective X <u>The flows and levels in rivers and lakes have depth and variability to support geomorphic functions, maintain healthy aquatic ecosystems, and support a range of values and uses.</u>
277.12	Fonterra Co-operative	Objective 9	Oppose in	Amend the Objective to read –

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Group Ltd		part	“(a) The quantity of water in surface waterbodies is managed so that aquatic ecosystem health, life-supporting capacity, outstanding natural features and landscapes, <del>recreational values</del> , natural character, and historic heritage values of surface waterbodies and their margins are safeguarded; and  (b) Provided (a) is met, water is available both instream and out-of-stream to support the reasonable needs of people and communities to provide for their social, economic and cultural wellbeing.”
279.9	Forest & Bird NZ	Objective 9	Support with minor amendment	Amend Objective 9 as follows: The quantity <u>and quality</u> of water in <del>surface</del> waterbodies <u>and coastal water</u> is managed so that aquatic ecosystem health, life-supporting capacity, outstanding natural features and landscapes, <u>significant indigenous vegetation and habitats</u> , recreational values, natural character, and historic heritage values of surface waterbodies and their margins are safeguarded <u>and protected</u> ; and
292.3	G S & M A Clearwater Ltd	Objective 9	Support	Retain.
339.4	GUNN Olivia	Objective 9	Oppose	We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity. This objective must be rewritten to show this.
361.4	HBG AgriLimited	Objective 9	Oppose	Amend Objective 9 so that equal importance is given to economic, social and cultural wellbeing as well as water quality/quantity.
372.2	Heritage NZ	Objective 9	Support	Retain.
386.5	Hopcroft Farms Ltd	Objective 9	Oppose	I recommend equal application of the rules over all values. I recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
387.3	HORRELL Andrew Russell	Objective 9(b)	Oppose	Amend to recognise that water quality, social, cultural and economic values are of equal importance to the Southland community.
389.3	HORRELL P J & J M	Objective 9		Acknowledge the Lower Waiau as a unique situation.
390.3	Horticulture NZ	Objective 9	Support in part	Add to Objective 9 as follows: <u>Recreational values and historic heritage values will be identified through the FMU process and reflected in the management of freshwater and associated ecosystems.</u>
397.1	Hughes-Crowley Company Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars - social, economic, cultural and water quality/quantity.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
414.1	Irrigation NZ Incorporated	Objective 9		(a) The quantity of water in surface waterbodies is managed so that aquatic ecosystem health, life-supporting capacity <del>outstanding natural features and landscapes, recreational values, natural character, and historic heritage</del> <u>and the health of people and communities, at least as affected by secondary contact with fresh water</u> , values are safeguarded; and (b) Providing (a) is met, water is available both instream and out-of-stream to support the reasonable needs of people and communities to provide for their social, economic and cultural well-being.
431.1	Kaikaha Farms Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
449.2	KiwiRail Holdings Ltd (KiwiRail)	Objective 9(a)	Amend	Amend as follows: (a) the quantity of water in surface waterbodies is managed so that aquatic ecosystem health, life-supporting capacity, outstanding natural features and landscapes, recreational values, <b>and</b> natural character, <del>and historic heritage</del> values of surface waterbodies and their margins are safeguarded, and...
451.4	Knockinnon Farm Trust	Objective 9	Oppose	Amend to give equal importance to the four pillars – social, economic, cultural and water quality.
467.3	Lawrence Farms Ltd (Gavin Lawrence)	Objective 9	Support	Retain.
478.3	LOVERIDGE David	Objective 9	Oppose	We oppose and recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
482.6	Lower Aparima Catchment Group	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
564.5	Mid-Aparima Catchment Group	Objective 9	Oppose	We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity. This objective must be rewritten to show this.
583.3	MOSEBY Ryan	Objective 9	Support	Retain.
640.3	Pourakino Catchment Group	Objective 9	Support	Retain.
711.2	SCOTT G D & M M	Objective 9(b)	Support	Retain.
712.8	Seaview Trust & Oraka Farms Ltd	Objective 9	Oppose	Oppose and remove.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
737.2	Smithill Ltd	Objective 9	Amend	<p>“Objective 9” (a) and (b) are equally as important as one another; they should be joined not separate. We believe that section (b); economic, cultural wellbeing and social impact on the water quality is equal to section (a):</p> <p>“The quantity of water in surface waterbodies is managed so that aquatic ecosystem health, life-supporting capacity, outstanding natural features and landscapes, recreational values, natural character, and historic heritage values of surface waterbodies and their margins are safeguarded.”</p>
741.1	South Hughes Farms Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars –social, economic, cultural and water quality/quantity.
749.21	Southland Conservation Board	Objective 9	Support	Retain.
752.25	Southland Fish & Game Council	Objective 9	Support in part	<p>Retain Objective 9 as notified with the following amendment to (a):</p> <p>(a) The quantity <u>and quality</u> of water in <u>surface</u> waterbodies <u>and coastal water</u> is managed <u>to ensure</u> <del>so</del> that <u>aquatic freshwater and marine</u> ecosystems health, <u>and their</u> life supporting capacity, outstanding natural features and landscapes, <u>significant indigenous vegetation and habitats</u> recreational values, natural character, and historic heritage values of surface waterbodies and their margins are safeguarded <u>and protected</u>.</p>
761.5	STALKER Hanna & Callum	Objective 9	Oppose	We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity. This objective must be rewritten to show this.
765.1	Stenkoll Farms Ltd	Objective 9	Oppose	We recommend equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
768.4	STEVENSON Audrey	Objective 9	Oppose	Future provision is needed to free up water for ever changing needs in the region.
810.3	Three Rivers Catchment Group (TRCG)	Objective 9	Support	Retain.
832.10	VAN GOOL Raewyn	Objective 9	Support	Retain.
861.5	WHITE John Copeland	Objective 9	Oppose	We recommend that as per the RMA, equal importance be given to the four pillars – social, economic, cultural and water quality/quantity.
895.12	Z Energy, BP Oil NZ &	Objective 9	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Mobil Oil NZ (Oil Companies)			

## Objective 10

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.10	Aratiatia Livestock Ltd	Objective 10	Support	Please note that in our submission on Objective 7 we made the case for the alignment of the NPSF and the Meridian Resource Consent timeline.
108.10	BYTHELL Jesse	Objective 10	Support	Retain.
156.2	COCKBURN Grant & Rachel	Objective 10	Oppose	Provide for the Power Scheme but also provide a pathway for a community discussion regarding a small community allocation of surface water in order to free up the under allocated ground water in the catchment.
210.31	Director-General of Conservation	Objective 10	Support in part	Retain the Objective 10 as notified with the following amendment: The national importance of the existing Manapōuri Power Scheme in the Waiau catchment is provided for and recognised in any resulting flow and level regime <u>whilst protecting the natural values of the Lakes Te Anau and Manapouri and fishery values of the Upper Waiau and maintaining the freshwater habitat of the Lower Waiau River and adjacent wetlands.</u>
300.7	GARDYNE Jonathan	Objective 10	Oppose	Delete.
328.1	GOBLE Peter & Susan	Objective 10	Oppose	Excluding Te Anau farmers from being able to irrigate is contradictory to objective 9(b), objective 10 and 11. We would like to see future provisions for the economic benefit of the region.
389.4	HORRELL P J & J M	Objective 10	Oppose	Delete.
437.6	KEMPTHORNE Robert	Objective 10	Oppose in part	Amend Objective 10 to free up a small amount of this water for the ever changing needs and uses of water in the Waiau catchment for its most efficient use. Include a provision to uniquely manage the Waiau FMU process with respect to water quality aspects given the significant and permanent degree of modification within the catchment and the special status the Manapouri power scheme has within regional and national legislation.
562.1	Meridian Energy Ltd	Objective 10	Oppose in part	Amend objective 10 to read: The national importance of the existing Manapouri Power Scheme in the Waiau catchment is provided for, and 1. <u>is recognised in any resulting flow and level regime, and</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>2. <u>the Manapouri Power Scheme including its associated water takes, use, damming, diverting and discharge of contaminants and water to water or onto and into land where this enters water is considered as part of the existing environment; and</u></p> <p>3. <u>allows for enhancement of the scheme where the effects of these can be appropriately managed.</u></p>
752.26	Southland Fish & Game Council	Objective 10	Support in part	Retain Objective 10 as notified with the following amendment: <u>“The national importance of the existing Manapouri Power Scheme in the Waiau catchment is provided for, and recognised in any resulting flow and level regime, whilst avoiding any further over-allocation of freshwater. Opportunities exist for ongoing mitigation and remediation that will result in the restoration of ecological values associated with the modified environmental flow and level regimes of the Waiau catchment.”</u>
768.5	STEVENSON Audrey	Objective 10	Oppose	Future provision is needed to free up water for ever changing needs in the region.
786.2	SUTHERLAND Kevin & Ann	Objective 10	Oppose	Delete.
832.11	VAN GOOL Raewyn	Objective 10	Support	Retain.
871.1	WILLANS Murray & Tarn	Objective 10	Oppose	Provide for the Power Scheme but also provide a pathway for a community discussion regarding a small community allocation of surface water in order to free up the under-allocated groundwater in the catchment.
888.5	WOOLHOUSE K A & J A	Objective 10	Oppose	The Manapouri Power Scheme is up for consent renewal in 2025 and as such, the right others users in the Te Anau basin to use water efficiently should be specified as stated to protect future rights and claims to our water.
888.6	WOOLHOUSE K A & J A	Objection 10	Oppose	Identify other water users in the Te Anau basin to protect future rights and claims to our water.
895.13	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 10	Support	Retain.

## Objective 11

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.5	Alliance Group Ltd	Objective 11	Support in	Amend the objective as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	Water is allocated and used efficiently <u>having had regard to the primacy of community water supplies and priority takes.</u>
24.11	Aratiatia Livestock Ltd	Objective 11	Support	Retain.
108.11	BYTHELL Jesse	Objective 11	Support	Retain.
156.3	COCKBURN Grant & Rachel	Objective 11	Support	Retain.
190.8	DairyNZ	Objective 11	Support Amend	Amend to clarify how and at what scale “efficiency” is being determined.
209.9	DIPROSE Dave	Objective 11	Support	Retain.
210.32	Director-General of Conservation	Objective 11	Support	Retain.
249.8	Ernslaw One Ltd	Objective 11	Amend	Design / align the policy with current Central Government work on water allocation and pricing, while making provision for Iwi rights and interests in freshwater. As per the Land & Water Forum recommendation 131e, ensure that water use efficiency criteria apply to all users, not just those under a new regime.
265.23	Federated Farmers of NZ (Southland Province)	Objective 11	Oppose in part	Delete Objective 11 and replace with: <u>Water abstracted for individual or community drinking or stockwater supply, irrigation, or other uses, is taken and used in quantities which are reasonable for the intended use; and is conveyed and applied using methods which minimise loss or wastage.</u>
277.13	Fonterra Co-operative Group Ltd	Objective 11	Support	Retain.
279.10	Forest & Bird NZ	Objective 11	Support	Retain.
283.2	Foveaux Investments Ltd	Objective 11	Amend	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 measurable). 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 the industry.
328.2	GOBLE Peter & Susan	Objective 11	Oppose	Excluding Te Anau farmers from being able to irrigate is contradictory to objective 9(b), objective 10 and 11. We would like to see future provisions for the economic benefit of the region.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
337.7	Growplan Ltd	Objective 11		What about low flows and climate-event response flows and planning for such events? I believe water allocation (in some physiographic zones) should be based on a meaningful metric such as added market value, or protein content – there has to be some rational way of valuing water and adding environmental protection. For instance irrigating in zones with severe water deficits is wasteful. This could also be a robust method where controls could be introduced to sensitive (e.g. high P loss) catchments.
381.3	HOLDER Wendy & Tom	Objective 11		Water is allocated equally and consistently to all in Southland for their reasonable and efficient use.
389.5	HORRELL P J & J M	Objective 11		Will the plan be able to assess efficient use of water that is fully allocated to Meridian? Will the plan create provisions for other water uses?
390.4	Horticulture NZ	Objective 11	Support	Retain.
414.2	Irrigation NZ Incorporated	Objective 11		Delete and replace with: <u>Water allocation is efficient and recognises the importance of water supply reliability in providing for efficient use. Abstracted water is shown to be necessary and reasonable for its intended use and any water that is abstracted is used efficiently.</u>
437.7	KEMPTHORNE Robert	Objective 11	Oppose in part	Amend Objective 11 to free up a small amount of this water for the ever changing needs and uses of water in the Waiau catchment for its most efficient use. Include a provision to uniquely manage the Waiau FMU process with respect to water quality aspects given the significant and permanent degree of modification within the catchment and the special status the Manapouri power scheme has within regional and national legislation.
467.4	Lawrence Farms Ltd (Gavin Lawrence)	Objective 11	Support	Retain.
477.4	Longwood Properties Ltd	Objective 11	Amend	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 measurable should be set such that they are genuinely achievable for industry.
611.2	NZ Defence Force	Objective 11	Support	Retain.
622.8	P F Olsen Ltd	Objective 11	Amend	There needs to be an added objective that recognises that allocation mechanisms need to be based on fundamental principles that recognise that change is needed, that such change will occur within an overriding framework of “natural capital” baselines and market transfer mechanisms applying to all directly involved participants in a landscape.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
749.22	Southland Conservation Board	Objective 11	Support	Retain.
752.27	Southland Fish & Game Council	Objective 11	Oppose	Delete Objective 11 and replace with: <u>“Water use must be necessary, reasonable and justifiable for its intended use, and where it meets these criteria its use must be efficient.”</u>
757.4	Southwest Properties Ltd	Objective 11	Amend	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.
768.6	STEVENSON Audrey	Objective 11	Oppose	Future provision is needed to free up water for ever changing needs in the region.
813.4	Tihaka Farms	Objective 11	Amend	We suggest that this objective is 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 measurable should be set such that they are genuinely achievable for industry.
832.12	VAN GOOL Raewyn	Objective 11	Support	Retain.
842.4	Waihoaka Holdings Ltd	Objective 11	Amend	We suggest that this objective is 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 measurable should be set such that they are genuinely achievable for industry.
871.2	WILLANS Murray & Tarn	Objective 11	Support	Support this objective but this is in conflict with objective 10 where it is arguable whether using all of the available surface water in the catchment for power generation is “efficient use”.
895.14	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 11	Support	Retain.

## Objective 12

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.12	Aratiatia Livestock Ltd	Objective 12	Support	Retain.
108.12	BYTHELL Jesse	Objective 12	Support	Retain.
190.9	DairyNZ	Objective 12	Support Amend	Amend to provide greater clarity regarding the term “maintained”.
210.33	Director-General of Conservation	Objective 12	Support in part	Retain the Objective 12 as notified with the following amendment: Groundwater levels, <u>and natural stream flow variability</u> and minimum surface water flows where these are derived from groundwater, are maintained.
265.24	Federated Farmers of NZ (Southland Province)	Objective 12	Oppose	Delete.
279.11	Forest & Bird NZ	Objective 12	Support	Retain.
337.8	Growplan Ltd	Objective 12		Clarify whether the monitoring network is dense enough to model GW levels within levels that will protect key catchment metrics?
414.3	Irrigation NZ Incorporated	Objective 12		Delete and replace with: <u>Groundwater resources remain a sustainable source of water which is available for abstraction while supporting base flows or levels in surface water bodies, springs and wetlands.</u>
483.2	Ludell Ltd	Objective 12	Support	Environment South must consider the financial, economic and social repercussions to Southland of implementing these objectives.
712.9	Seaview Trust & Oraka Farms Ltd	Objective 12		Provide equal consideration to environmental, social, cultural and economic considerations in the plans objectives.
749.23	Southland Conservation Board	Objective 12	Support	Retain.
752.28	Southland Fish & Game Council	Objective 12	Support in part	Retain Objective 12 as notified with the following amendment: “Groundwater levels, and minimum water flows where these are derived from groundwater are maintained: <u>where not over allocated and any over allocation is phased out in accordance with timeframes established under the Freshwater Management Unit process or earlier when considering consent applications for groundwater takes.</u> ”
832.13	VAN GOOL Raewyn	Objective 12	Support	Retain.
895.15	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil	Objective 12	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Companies)			

### Objective 13

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.13	Aratiatia Livestock Ltd	Objective 13	Support	Retain.
48.9	Ballance Agri-Nutrients	Objective 13	Support	Retain.
108.13	BYTHELL Jesse	Objective 13	Support	Retain.
189.2	Dairy Holdings Ltd	Objective 13	Support	Retain
209.10	DIPROSE Dave	Objective 13	Support	Retain.
210.34	Director-General of Conservation	Objective 13	Support in part	Retain the Objective 13 with the following addition: (d) <u>it is in a manner which prevents significant adverse effects on the natural flow regime of the stream in that catchment where the development is proposed and in particular:</u> <ul style="list-style-type: none"> <li>• <u>avoid increasing the severity of low flows; and</u></li> <li>• <u>avoid increasing the magnitude of the flood flows and their significant adverse effects on river and flood plain values and infrastructure.</u></li> </ul>
220.4	Drylands Farming Ltd	Objective 13(a)	Oppose	Rule changes to accommodate this in Rule 23, intensive winter grazing.
221.4	DRYSDALE Family Trust	Objective 13(a)	Oppose	Rule changes to accommodate this in Rule 23, intensive winter grazing.
265.25	Federated Farmers of NZ (Southland Province)	Objective 13	Oppose in part	Delete Objective 13 and replace with: (a) <u>In rural areas, farming activities and other land uses maintain or improve the quality and structure of soils; and maintain or enhance freshwater bodies and biodiversity.</u>  (b) <u>In urban areas:</u> (i) <u>Sewage is treated before being discharged into water;</u> (ii) <u>Natural wetlands are protected from drainage and filling; and</u> (iii) <u>Biodiversity is maintained or enhanced.</u>
277.14	Fonterra Co-operative Group Ltd	Objective 13	Oppose	Delete “amenity values” from Objective 13(c) or alternatively amend the context of Objective 13 so as to relate to amenity values associated with the discharge of contaminants to land or

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				water, rather than the use and development of land and soils more generally.
279.12	Forest & Bird NZ	Objective 13		Amend Objective 13 as follows: (a) The quantity, quality and structure of soil resources are <u>managed to avoid irreversible degradation</u> <del>not irreversibly degraded</del> through land use activities and discharges to land; (b) the discharge of contaminants to land or water that have <del>significant</del> <u>adverse</u> or cumulative effects on human health <u>and recreation</u> are avoided; and (c) adverse effects on ecosystems (including <u>indigenous</u> diversity and integrity of habitats), amenity values, cultural values and historic heritage values are avoided, remedied or mitigated to ensure these values are <del>maintained</del> safe guarded or enhanced. (d) <u>Provided a, b and c is met enable the use of development of land and soils.</u>
292.4	G S & M A Clearwater Ltd	Objective 13	Support	Retain.
342.2	H W Richardson Group	Objective 13	Oppose in part	Amend the objective as follows: Enable the use and development of land and soils, provided: (a) The quantity, quality and structure of soil resources are not irreversibly degraded through land use activities and discharges to land; (b) The discharge of contaminants to land or water that have <del>significant or cumulative</del> <u>adverse</u> effects on human health are avoided, <u>remedied or mitigated</u> ; and Adverse effects on ecosystems (including diversity and integrity of habitats), amenity values, cultural values and historic heritage values are avoided, remedied or mitigated to ensure these values are maintained or enhanced.
372.3	Heritage NZ	Objective 13	Support	Retain.
390.5	Horticulture NZ	Objective 13	Support in part	Reword Objective 13 (b) as follows: the discharge of contaminants to land or water that have significant <u>adverse</u> or cumulative effects on human health are avoided, <u>remedied or mitigated</u> .
449.3	KiwiRail Holdings Ltd (KiwiRail)	Objective 13	Amend	Amend as follows: Enable the use and development of land and soils, provided: (a) the quantity, quality and structure of soil resources are not irreversibly degraded through land use activities and discharges to land; (b) the discharge of contaminants to land or water that have significant or cumulative effects on human health are avoided; and (c) adverse effects on ecosystems (including diversity and integrity of habitats), amenity values, <u>and</u> cultural values <del>and historic heritage values</del> are avoided remedied or mitigated to ensure



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				these values are maintained or enhanced.
483.3	Ludell Ltd	Objective 13	Support	Environment South must consider the financial, economic and social repercussions to Southland of implementing these objectives.
558.2	MCRAE Natalie	Objective 13	Amend	Remove the word 'provided' and the requirements of (a) to (c) inclusively. Amend the objective to state "Enable the use and development of land and soils to support the economic, social and cultural wellbeing of the region."
583.4	MOSEBY Ryan	Objective 13	Support	Retain.
640.4	Pourakino Catchment Group	Objective 13	Support	Retain.
661.9	Ravensdown Ltd	Objective 13	Support	Ravensdown seeks for the intent of Objective 13 to be retained, with clause (b) amended to read: "(b) the discharge of contaminants to land or water that have significant or cumulative <u>adverse</u> effects on human health are avoided..."
711.3	SCOTT G D & M M	Objective 13	Support	Retain.
712.10	Seaview Trust & Oraka Farms Ltd	Objective 13		Provide equal consideration to environmental, social, cultural and economic considerations in the plans objectives.
749.24	Southland Conservation Board	Objective 13	Support	Retain.
752.29	Southland Fish & Game Council	Objective 13	Support in part	<p>Retain Objective 13 as notified with the following amendment:</p> <p>"Enable the use and development of land and soils, provided <u>that (a) – (d) are met:</u></p> <p>(a) <u>Adverse effects on the quantity, quality and structure of soil resources are not irreversibly degraded through land use activities and discharges to land are avoided, remedied or mitigated to ensure these values are maintained or enhanced;</u></p> <p>(b) The discharge of contaminants to land or water that have <del>significant</del> adverse or cumulative effects on human health <u>and recreation</u> are avoided; <del>and</del></p> <p>(c) Adverse effects on ecosystems (including diversity and integrity of habitats), amenity values, <u>recreational values</u>, cultural values and historic heritage values are avoided, remedied or mitigated to ensure these values are maintained or enhanced; <u>and</u></p> <p>Insert new bullet point as follows:</p> <p>(d) <u>Significant adverse effects on the natural flow regime of rivers, including the duration and severity of low flow conditions and the magnitude of flood flows, are avoided.</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
803.11	The Fertiliser Association of NZ	Objective 13	Support in part Amend	Amend Objective 13 as follows: Enable the use and development of land and soils, provided: <del>(a) the quantity, quality and structure of soil resources are not irreversibly degraded through land use activities and discharges to land;</del> (a) <u>The biological, chemical and physical soil properties are maintained or enhanced;</u> (b) the discharge of contaminants to land or water that have significant or cumulative <u>adverse</u> effects on human health are avoided; and (c) adverse effects on ecosystems (including diversity and integrity of habitats), amenity values, cultural values and historic heritage values are avoided, remedied or mitigated to ensure these values are maintained or enhanced.
810.4	Three Rivers Catchment Group (TRCG)	Objective 13	Support	Retain.
832.14	VAN GOOL Raewyn	Objective 13	Support	Retain.
895.16	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 13(b)		Amend clause (b) of Objective 13 to refer to all significant effects from the discharge of contaminants. This could be achieved by deleting 'cumulative' from clause (b) and relying instead on the definition of effects in the Act, which encapsulates cumulative effects.  <b>Objective 13</b> Enable the use and development of land and soils, provided: (a) the quantity, quality and structure of soil resources are not irreversibly degraded through land use activities and discharges to land; (b) the discharge of contaminants to land or water that have significant <del>or cumulative</del> effects on human health are avoided; and (c) adverse effects on ecosystems (including diversity and integrity of habitats), amenity values, cultural values and historic heritage values are avoided, remedied or mitigated to ensure these values are maintained or enhanced.

## Objective 14

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.14	Aratiatia Livestock Ltd	Objective 14	Support	See our comments under Objective 7.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.14	BYTHELL Jesse	Objective 14	Support	Retain.
210.35	Director-General of Conservation	Objective 14	Support	Retain.
265.26	Federated Farmers of NZ (Southland Province)	Objective 14	Oppose	Delete.
279.13	Forest & Bird NZ	Objective 14		Amend Objective 14 as follows: The range and diversity of indigenous ecosystem types, <u>species</u> and habitats within dryland environments, <u>all water bodies, including:</u> rivers, estuaries, wetlands <del>and</del> lakes, <u>and coastal waters, including their margins, and their life-supporting capacity are maintained or enhanced.</u>
288.6	Fulton Hogan Ltd & Southern Aggregates Ltd	Objective 14	Oppose	Amend the Objective to remove reference to the range of indigenous ecosystem types and habitats: Objective 14 The <del>range and</del> diversity of indigenous ecosystem types and habitats within dryland environments, rivers, estuaries, wetlands and lakes, including their margins, and their life-supporting capacity are maintained or enhanced. Or redraft the objective to better articulate what is intended by the use of the word range so as to give effect to the proposed RPS.
292.5	G S & M A Clearwater Ltd	Objective 14	Amend	Clarify who will be enhancing indigenous ecosystem types.
411.2	Invercargill City Council	Objective 14	Amend	That the reference to “dryland environments” be removed from the Objective.
640.5	Pourakino Catchment Group	Objective 14		Objective 14 - The range and diversity of indigenous ecosystem types and habitats within dryland environments, rivers, estuaries, wetlands and lakes, including their margins, and their life-supporting capacity are maintained or enhanced <u>where practicable.</u>
749.25	Southland Conservation Board	Objective 14	Support	Retain.
752.30	Southland Fish & Game Council	Objective 14	Support in part	Retain Objective 14 as notified with the following amendment: “The range and diversity of indigenous ecosystems types and habitats within dryland environments, <u>all waterbodies, including:</u> rivers, estuaries, wetlands <del>and</del> lakes, <u>and coastal waters including their margins, and their life supporting capacity are maintained or <del>enhanced</del> if degraded are restored to protect their values.</u> ”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
810.5	Three Rivers Catchment Group (TRCG)	Objective 14	Amend	Objective 14 The range and diversity of indigenous ecosystem types and habitats within dryland environments, rivers, estuaries, wetlands and lakes, including their margins, and their life-supporting capacity are maintained or enhanced <u>where practicable</u> .
832.15	VAN GOOL Raewyn	Objective 14	Support	Retain.
895.17	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 14	Support	Retain.

### Objective 15

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.15	Aratiatia Livestock Ltd	Objective 15	Support	We recommend to Council that all sources of N and P contributions to Southland's River systems should be actively managed and that this should include a Trout Nutrient Management Plan, to monitor and manage N and P contributions to the rivers from trout.
108.15	BYTHELL Jesse	Objective 15	Support	Retain.
210.36	Director-General of Conservation	Objective 15	Support	Retain.
265.27	Federated Farmers of NZ (Southland Province)	Objective 15	Oppose	Delete Objective 15 and replace with: <u>The relationship of Ngāi Tahu whānui and their customs and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga is recognised and provided for; and Ngāi Tahu are able to exercise kaitiakitanga over freshwater resources.</u>
742.3	South Island Eel Industry Association	Objective 15	Amend	We suggest that, for clarity, Objective 15 be changed to: The maintenance and enhancement of habitats of Taonga species, as set out in Appendix M, is recognised and provided for.
749.26	Southland Conservation Board	Objective 15	Support	Retain.
752.31	Southland Fish & Game Council	Objective 15	Support	Retain.
832.16	VAN GOOL Raewyn	Objective 15	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
895.18	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 15	Support	Retain.

## Objective 16

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.6	Alliance Group Ltd	Objective 16	Support	Retain.
24.16	Aratiatia Livestock Ltd	Objective 16	Support	Retain.
108.16	BYTHELL Jesse	Objective 16	Support	I seek the following amendment, so it reads, “Public access to rivers and lakes is maintained and <u>enhanced, provided there is no damage or destruction to significant indigenous vegetation or wildlife</u> , and except where public health and safety are at risk.”
210.37	Director-General of Conservation	Objective 16	Support	Retain the Objective 16 with the following amendment; Public access to river and lake beds is maintained, except in circumstances where public health and safety are at risk <u>or significant biodiversity values are being adversely affected</u> .
265.28	Federated Farmers of NZ (Southland Province)	Objective 16	Oppose	Delete.
277.15	Fonterra Co-operative Group Ltd	Objective 16	Support	Retain.
279.14	Forest & Bird NZ	Objective 16		Amend Objective 16 as follows: Public access to river and lake beds is maintained, except in circumstances where public health and safety, <u>or threatened species</u> are at risk.
300.8	GARDYNE Jonathan	Objective 16	Support	Retain.
337.9	Growplan Ltd	Objective 16	Amend	These attributes of freshwater bodies should not be all lumped together; protecting some attributes could arguably have a higher benefit than others. Some of these habitats are also very rare/unique where others may be more common, e.g. vernal pools / seasonally variable wetlands.
411.3	Invercargill City Council	Objective 16	Support	Retain.
449.4	KiwiRail Holdings Ltd (KiwiRail)	Objective 16	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
558.3	MCRAE Natalie	Objective 16	Amend	Add in requirement to check with landowner before entering property.
562.2	Meridian Energy Ltd	Objective 16	Support	Retain.
749.27	Southland Conservation Board	Objective 16	Amend	Amend the Objective to read: Public access to river and lake beds is maintained, <u>except where restrictions on public access are necessary to protect or enhance biodiversity values</u> and except in circumstances where public health and safety are at risk.
752.32	Southland Fish & Game Council	Objective 16	Support in part	Retain Objective 16 as notified with the following amendment: “Public access to <u>and along the coastal marine area</u> , lakes and rivers ( <u>including beds of streams and modified watercourses</u> ) is maintained <u>and enhanced</u> <del>except in circumstances where public health and safety are at risk.</del> ”
832.17	VAN GOOL Raewyn	Objective 16	Support	Retain.
895.19	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 16	Support	Retain.

## Objective 17

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.17	Aratiatia Livestock Ltd	Objective 17	Support	Retain.
108.17	BYTHELL Jesse	Objective 17	Support	Retain.
209.11	DIPROSE Dave	Objective 17	Neutral	Amend to ‘Natural formed’ wetlands.
210.38	Director-General of Conservation	Objective 17	Support in part	Retain the Objective 17 as notified with the following amendment; The natural character values of wetlands, rivers and lakes including channel <u>and large bare gravel bar</u> form, bed rapids, seasonably variable flows and natural habitats, are protected from inappropriate use and development.
265.29	Federated Farmers of NZ (Southland Province)	Objective 17	Oppose	Delete Objective 17 and replace with: <u>The natural character and any outstanding natural features of rivers and lakes are protected from inappropriate use or development.</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.15	Forest & Bird NZ	Objective 17		Amend Objective 17 as follows: The natural character values of wetlands, rivers and lakes <u>and their margins</u> including channel form, bed rapids, seasonably variable flows and natural habitats, are <u>preserved and</u> protected from inappropriate use and development.
288.7	Fulton Hogan Ltd & Southern Aggregates Ltd	Objective 17	Oppose	Amend Objective 17 to better have regard to the proposed RPS. For example: Objective 17: The natural character values of wetlands, rivers and lakes including channel form, bed rapids, seasonably variable flows and natural habitats, are <u>where practicable</u> protected from inappropriate use and development.
337.10	Growplan Ltd	Objective 17	Amend	These attributes of freshwater bodies should not be all lumped together; protecting some attributes could arguably have a higher benefit than others. Some of these habitats are also very rare/unique where others may be more common, e.g. vernal pools / seasonally variable wetlands.
449.5	KiwiRail Holdings Ltd (KiwiRail)	Objective 17	Support	Retain.
614.1	NZ Transport Agency	Objective 17	Support	Retain.
749.28	Southland Conservation Board	Objective 17	Amend	Re-word the Objective to read: The natural character values of wetlands, rivers and lakes....is protected from <del>inappropriate</del> <u>incompatible</u> use and development.
752.33	Southland Fish & Game Council	Objective 17	Support in part	Retain Objective 17 as notified with the following amendment: “The natural character values of wetlands, rivers, lakes <u>and their margins</u> , including channel form, bed rapids, seasonably variable flows and natural habitats, are <u>recognised</u> and protected from inappropriate use and development.”  Insert the words “ <u>and their margins</u> ” throughout the pWLP wherever provisions are referring to the management of river and / or lake beds, e.g. “lakes, rivers <u>and their margins</u> .” Include a definition of lake and river margins in the Glossary of the pWLP as submitted by Fish & Game – see Glossary section of this submission.
832.18	VAN GOOL Raewyn	Objective 17	Support	Retain.
895.20	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 17	Support	Retain.

## Objective 18

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.7	Alliance Group Ltd	Objective 18	Oppose in part	Amend the objective as follows: All <u>farming</u> activities operate at ‘good (environmental) management practice’ or better <u>in accordance with a Farm Management Plan</u> to optimise efficient resource use and protect the region’s land, soils and water from quality and quantity degradation.
24.18	Aratiatia Livestock Ltd	Objective 18	Neutral	Reword the objective to clarify exactly what the Council is hoping to achieve.
25.4	Ardel Dairies Ltd	Objective 18	Support with changes	Good environmental practice or better needs to be defined and industry should lead the standards to be measured as the best on farm practice.
47.2	Balfour, Wendonside & Waikaia Group	Objective 18	Support Amend	Amend to read: “All activities operate at “good (environmental) management practice” <del>or better</del> to optimise efficient resource use and protect the region’s land, soils, and water from quality and quantity degradation.”
48.10	Ballance Agri-Nutrients	Objective 18	Support in part	Amend to read: <b>Objective 18</b> <u>Where practicable,</u> <del>a</del> All activities operate at “good (environmental) management practice” or better to optimise efficient resource use and protect the region’s land, soils, and water from <u>overall</u> quality and quantity degradation.
81.4	BLAKELY Hamish & Hannah	Objective 18		Farmers need to be recognised as being the leaders in this.
89.1	BRENTLEIGH Family Trust	Objective 18		Farmers need to be recognised as being the leaders in this.
108.18	BYTHELL Jesse	Objective 18	Support	Retain.
186.1	D R & J A E Pullar Ltd	Objective 18	Amend	The plan should set out the methods for determining good management practice. This may be wider than just Environment Southland publications and should include any appropriate industry standards or codes of practice.
189.3	Dairy Holdings Ltd	Objective 18		Amend Objective 18: All activities operate at “good ( <del>environmental</del> ) management practice” or better to optimise efficient resource use and protect the region’s land, soils, and water from quality and quantity degradation..
192.3	DALE P T & S B Trust	Objective 18	Amend	Riparian planting should not be part of all stock exclusion requirements as this could pose a



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				financial burden on farming businesses. Can be encouraged only.
205.4	Dillon Ag Ltd (Chris Dillon)	Objective 18		Concentrate plan more on urban point source discharges.
206.4	Dillon Ag Ltd (Rochelle Dillon)	Objective 18		Concentrate plan more on urban point source discharges.
209.12	DIPROSE Dave	Objective 18	Neutral	Retain.
210.39	Director-General of Conservation	Objective 18	Support	Retain.
220.5	Drylands Farming Ltd	Objective 18	Support Amend	“or better” needs to be removed from Objective 18 as it creates uncertainty to those undertaking activities and what measures are appropriate.
221.5	DRYSDALE Family Trust	Objective 18	Support Amend	“or better” needs to be removed from Objective 18 as it creates uncertainty to those undertaking activities and what measures are appropriate.
259.1	F D Enterprises Ltd	Objective 18	Support Amend	Amend Objective 18 to read: “All activities operate at “good (environmental) management practice” <del>or better</del> to optimise efficient resource use and protect the region’s land, soils, and water from quality and quantity degradation.”
264.1	FarmRight Ltd	Objective 18	Amend	Amend Objective 18 to read: “All activities operate at “good (environmental) management practice” <del>or better</del> to optimise efficient resource use and protect the region’s land, soils, and water from quality and quantity degradation.”
265.30	Federated Farmers of NZ (Southland Province)	Objective 18	Oppose in part	Delete Objective 18 and replace with: <u>The efforts and actions of people to manage effects of farming or other activities on soil structure, freshwater or biodiversity are recognised and supported as being integral to sustainable land and freshwater management.</u>
277.16	Fonterra Co-operative Group Ltd	Objective 18	Support in part	Insert a separate objective to ensure that discharges arising from industrial and trade processes operate in accordance with the BPO; Or alternatively, amend Objective 18 as follows: “ <u>Objective 18</u> All activities operate <del>at</del> <u>in accordance with (at least)</u> “good (environmental) management practice”, <del>or better</del> <u>in the case of discharges from industrial or trade processes in accordance with the best practicable option,</u> to optimise efficient resource use <u>safeguard the life supporting</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<del>capacity of the region's land and soils and protect maintain or improve the quality and quantity of the region's land, soils, and water from quality and quantity degradation.</del>
279.16	Forest & Bird NZ	Objective 18	Support	Retain.
288.8	Fulton Hogan Ltd & Southern Aggregates Ltd	Objective 18	Oppose	Delete Objective 18 or significantly re-draft to avoid the potential interpretation issues associated with the term 'Good (environmental) management practice' and to avoid conflict with other objectives of the plan.
292.6	G S & M A Clearwater Ltd	Objective 18	Support	Retain.
300.9	GARDYNE Jonathan	Objective 18	Support	This should be number 2 on the list rather than at the bottom. This should be the key of the plan, education always beats rules.
331.1	GRANT J J & J L	Objective 18	Support Oppose	Remove "or better" in wording.
337.11	Growplan Ltd	Objective 18	Amend	Use 'best' management practice, as it is a recognised term, a term about quality whereas 'good' is meaningless in this context.
342.3	H W Richardson Group	Objective 18	Oppose in part	Amend the objective as follows: All <u>farming</u> activities operate at "good (environmental) management practice" or better <u>in accordance with a Farm Management Plan</u> to optimise efficient resource use and protect the region's land, soils and water from quality and quantity degradation.
390.6	Horticulture NZ	Objective 18	Support	Retain.
437.8	KEMPTHORNE Robert	Objective 18	Oppose in part	Amend Objective 18 to include a statement to the effect that "the majority of communities remain fiscally sound and resource use supports the reasonable current and future needs of that community".
449.6	KiwiRail Holdings Ltd (KiwiRail)	Objective 18	Support	Retain.
464.2	Landpro Ltd	Objective 18	Support Amend	Amend Objective 18 to read: "All activities operate at "good (environmental) management practice" <del>or better</del> to optimise efficient resource use and protect the region's land, soils, and water from quality and quantity degradation."
569.2	MILLER R J Trust	Objective 18	Oppose	Amend to read: "all activities operate at 'good (environmental) management practice' <del>or better</del> to optimise efficient resource use and protect the regions land, soils and water from quality and quantity degradation."

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
570.5	MILLER R L & S J Farm Trust	Objective 18	Support in part	Add a sentence recognising people's use of GMP to enhance water and soil health and how important it is to land and water management.
583.5	MOSEBY Ryan	Objective 18	Support	Retain.
609.1	NZ Deer Farmers Association – Southland Branch (Richard Cook)	Objective 18	Support	Retain.
640.6	Pourakino Catchment Group	Objective 18	Support	Retain.
661.10	Ravensdown Ltd	Objective 18	Oppose	Ravensdown seeks for Objective 18 to be deleted as Industry Good Management Practice is a method to achieve the objectives. The objectives providing for the sustainable management of the natural and physical resources in Southland are already well defined by Objectives 1 – 17.
681.5	Rockytommy Farming Ltd	Objective 18	Support Amend	Remove the word 'better'.
682.2	Rokenwai Farming Ltd	Objective 18	Support Amend	Best practise on farm is the way forward – remove the word 'better'.
711.4	SCOTT G D & M M	Objective 18	Support	Retain.
749.29	Southland Conservation Board	Objective 18	Support	Retain.
752.34	Southland Fish & Game Council	Objective 18	Support Amend	Amend Objective 18 to provide: “All activities operate at <u>measurable and accountable</u> “good (environmental) management practice” or better to optimise efficient resource use and achieve the following: <del>protect the region's land and water from quality and quantity degradation</del> <u>a. Soil conservation;</u> <u>b. Maintenance and enhancement of the quality of water in water bodies and coastal water;</u> <u>c. Maintenance of water quantity;</u> <u>d. Maintenance and enhancement of ecosystems in water bodies and coastal water.”</u>
759.2	Springlands Group Ltd	Objective 18	Support Amend	Amend Objective 18 to read: “All activities operate at “good (environmental) management practice” <u>or better</u> to optimise efficient resource use and protect the region's land, soils, and water from quality and quantity degradation.”
762.1	STANLEY Karen	Objective 18	Support	Critical source areas to be managed as farm environmental management plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
792.4	TAYLER Matthew	Objective 18		Modify Objective 18 (or add an additional new objective) recognizing the benefit of promoting GMP's and education before resorting to regulation and rules to foster community buy-in/engagement and thus allowing the majority of the environmental benefits desired to be achieved at least cost/disruption.
802.4	The 254 Partnership & Gerken Family Trust	Objective 18		Farmers need to be recognised as being the leaders in this.
803.12	The Fertiliser Association of NZ	Objective 18	Oppose	Delete.
810.6	Three Rivers Catchment Group (TRCG)	Objective 18	Support	Retain.
832.19	VAN GOOL Raewyn	Objective 18	Support	Retain.
877.8	WILSON Aaron	Objective 18	Support	FMPs should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.
880.13	WILSON Shannon	Objective 18	Support	The W&L plan should be based on GMPs and FEP. Policies and rules in the plan should be based on this. FMPs should be the cornerstone of this W&L plan and take precedence over a consenting regime.
895.21	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Objective 18	Support	Retain.

### New objective required

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.31	Federated Farmers of NZ (Southland Province)	New objective		Insert the following objective: <u>Landowners, water users and communities are involved in the planning and management of the region's freshwater water resources in a collaborative way that recognises the stewardship role they play in freshwater management.</u>
330.2	Gore District Council, Invercargill City Council and Southland District Council	New objective		A new Region-wide objective is inserted as follows: <b>Objective A:</b> <u>The benefits of critical infrastructure to health and safety and the economic, social and cultural</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>wellbeing of people and communities are recognised, while any adverse environmental effects resulting from critical infrastructure are minimised.</u>
390.7	Horticulture NZ	New objective		Include a new objective as follows: <u>Give effect to the National Policy Statement for Freshwater Management (2014) by undertaking a process for the identified Freshwater Management Units to identify values, establish objectives and set water quality and quantity limits and targets for each Freshwater Management Unit.</u>
410.1	Invercargill Airport Ltd	New objective		IAL submits that a further objective is required to ensure that land use and discharge activities do not adversely affect the ability to efficiently operate existing physical resources such as Invercargill Airport.
464.3	Landpro Ltd	New objective		We seek that ES include a specific objective (or similar) that recognises natural resources must be managed in an integrated manner.
465.1	Lankirk Trust	New objective		That additional Objective(s) and Policy statements be included which recommend that the Council and its officers consider and give weight to the economic costs and benefits of activities which impact land, water and air, along with the direct and indirect financial and social effects of any proposed or actual rules on the people, businesses and communities that are affected.
562.3	Meridian Energy Ltd	New objective		Insert a New Objective to read: <u>Recognise and make provision for the national significance of renewable electricity generation activities.</u> <u>OR</u> Amend Objective 2 to read: Water and land is recognised as an enabler of the economic, social and cultural wellbeing <del>of the region.</del>
614.2	NZ Transport Agency	New objective		New Objective - <u>Recognise and provide for regional, national and critical infrastructure.</u>
628.3	PATERSON Stephanie	New objective	Amend	Please establish an objective that aids farmers so that we can all work together to an end goal, recognising the need to protect the region's main economic source.
640.7	Pourakino Catchment Group	New objective		<u>New Objective – Recognise and provide for the economic and social benefits of farming.</u>
752.35	Southland Fish & Game Council	New objective		Insert new Objective as follows: <u>“Objective X – Contact recreation standard</u>  (a) <u>To maintain surface water quality in rivers, lakes, and lagoons that already meet the “human health for contact recreation” standards for E. coli and Cyanobacteria -</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Planktonic set out in National Objectives Framework in the National Policy Statement for Freshwater Management (2014); and</u></p> <p>(b) <u>To improve surface water quality in rivers, lakes and lagoons degraded by land use and discharge activities to ensure compliance with the “human health for contact recreation” national bottom lines for E.coli and Cyanobacteria - Planktonic set out in the National Objectives Framework in the National Policy Statement for Freshwater Management (2014) by the year 2025.”</u></p>
752.36	Southland Fish & Game Council	New objective		<p>Insert new Objective as follows:</p> <p><b><u>“Habitat of Trout and Salmon</u></b></p> <p><u>The habitat of trout and salmon is recognised and provided for.”</u></p>
752.37	Southland Fish & Game Council	New objective		<p>Insert new Objective as follows:</p> <p><b><u>“Water Conservation Orders</u></b></p> <p><u>Protect values recognised in the Water Conservation (Mataura River) Order 1997 and Water Conservation (Oreti River) Order 2008 by avoiding or minimising adverse effects on recognised values.”</u></p>
752.38	Southland Fish & Game Council	New objective		<p>Insert a new objective in relation to the management of beds of wetlands, rivers and lakes as follows:</p> <p><b><u>“Management of beds of wetlands, rivers and lakes</u></b></p> <p><u>The beds of wetlands, rivers and lakes will be managed in a manner which:</u></p> <p>a. <u>Protects their life supporting capacity and ecological health and processes;</u></p> <p>b. <u>Protects cultural values and mahinga kai;</u></p> <p>c. <u>Recognises and provides for the habitat of trout and indigenous fish species;</u></p> <p>d. <u>Recognises and provides for recreational values;</u></p> <p>e. <u>Protects the natural character of the freshwater environment;</u></p> <p>f. <u>Provides for the natural flow characteristics and hydrodynamic processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and avoids adverse effects on these parameters; and</u></p> <p>g. <u>Recognises and provides for aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats, and avoids adverse effects on these parameters.”</u></p>
792.5	TAYLER Matthew	New objective		<p>An additional objective (or objective 2 sufficiently modified) to ensure the costs imposed on landowners are not prohibitively expensive or disproportionate to the environmental gains envisaged.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
792.6	TAYLER Matthew	New Objective		An additional objective (or modify objective 18) recognizing the benefit of promoting GMP's and education before resorting to regulation and rules to foster community buy-in/engagement and thus allowing the majority of the environmental benefits desired to be achieved at least cost/disruption.
810.7	Three Rivers Catchment Group (TRCG)	New objective		New Objective – <u>Recognise and provide for the economic and social benefits of farming.</u>

### Region-wide policies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
300.10	GARDYNE Jonathan	General	Oppose	I suggest that we have policies which encourage sustainable environmental and economic land use rather than rules.
611.3	NZ Defence Force	General	Amend	Reintroduce a policy providing for a level of permitted surface water abstraction, damming, diversion and use, as was previously set out in Policy 23(e) of the draft SWLP.
752.39	Southland Fish & Game Council	General	Oppose	Retain, delete or amend policies, rules and schedules in the pWLP to ensure that they will, individually and collectively, direct how the objectives, as retained or amended by Fish & Game, are to be achieved.
752.40	Southland Fish & Game Council	General	Oppose	Amend provisions that allow significant adverse effects to be remedied or mitigated so that: <ol style="list-style-type: none"> <li>Adverse effects are first avoided, and where they cannot be avoided are remedied or mitigated; and</li> <li>Significant adverse effects are avoided.</li> </ol> <p>Ensure that the policies clearly set out the management outcomes to be achieved so that objectives of the pWLP are achieved and in particular the water quality standards in Appendix E.</p> <p>Recommend inclusion of “and where degraded improved” to policies and rules.</p> <p>Include methods, including rules, which ensure that over allocation is phased out over time (water takes and point and non-point sources discharges of contaminants from land to water bodies, including groundwater).</p>
752.41	Southland Fish & Game	Water Quality and Quantity	Support	Water Quality and Water Quantity Policies not covered specifically below are supported by Fish

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council	policies		& Game. Fish & Game seeks that they are retained as notified.
752.42	Southland Fish & Game Council	Resource consent policies		Consideration of Resource Consent Applications Policies not covered specifically below are supported by Fish & Game. Fish & Game seeks that they are retained as notified.
752.43	Southland Fish & Game Council	Freshwater Management Unit Process Policies	Support	Freshwater Management Unit Process Policies not covered specifically below are supported by Fish & Game. Fish & Game seeks that they are retained as notified.
797.7	Nga Runanga and TRONT	Policies	Support	Retain policies as proposed, unless otherwise indicated.

### Physiographic zone policies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.44	Southland Fish & Game Council	Physiographic zone policies	Support	<p>Retain the concept of physiographic units, but amend the policies to reflect actual water quality, its trends and consider the implications of existing land use and development/intensification on future water quality, particularly in sensitive or over-allocated sub-catchments and catchments.</p> <p>Amend all references in the Physiographic Zone Policies to provide:            “In the [<i>insert name of unit</i>] physiographic zone, avoid <u>as first preference, and if unable to avoid,</u> remedy or mitigate adverse effects on water quality from contaminants by;”</p> <p>Amend the wording in Physiographic Zone Policies to provide:            “Strongly discouraging the granting of resource consents for <u>new, or further intensification of existing dairy farming of cows</u> <del>additional dairy farming of cows . . .</del>”</p>

### Policy 1 – Enable papatipu runanga to participate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.19	Aratiatia Livestock Ltd	Policy 1	Support	Retain.
108.19	BYTHELL Jesse	Policy 1	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.40	Director-General of Conservation	Policy 1	Support	Retain.
265.32	Federated Farmers of NZ (Southland Province)	Policy 1	Oppose in part	Amend Policy 1(3) as follows: 3. reflect Ngāi Tahu values <del>and interests</del> in the management of and decision-making on freshwater and freshwater ecosystems in Southland/Murihiku, consistent with the Charter of Understanding.
358.6	HASTIE Stephen	Policy 1	Neutral	ES gain full knowledge and an understanding, of how farmers tenant their land. ES have a variety of farmers implementing best practice guidelines.
481.1	Lowburn Dairy Farms	Policy 1	Amend	All applications & consents processed only by regional council, Iwi not to have input on individual applications and consents.
749.30	Southland Conservation Board	Policy 1	Support	Retain.
752.45	Southland Fish & Game Council	Policy 1	Support	Retain.
797.8	Nga Runanga and TRONT	Policy 1	Support	Retain.
895.22	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 1	Support	Retain.

### Policy 2 – Take into account iwi management plans

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.20	Aratiatia Livestock Ltd	Policy 2	Support	Retain.
25.5	Ardel Dairies Ltd	Policy 2	Oppose	Clarify what Ngai Tahu indicators of health are.
89.2	BRENTLEIGH Family Trust	Policy 2	Amend	Clarify what Ngai Tahu indicators of health are.
108.20	BYTHELL Jesse	Policy 2	Support	Retain.
205.5	Dillon Ag Ltd	Policy 2	Amend	Clarify what Ngai Tahu indicators of health are.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Chris Dillon)			
206.5	Dillon Ag Ltd (Rochelle Dillon)	Policy 2	Amend	Clarify what Ngai Tahu indicators of health are.
207.1	Dillon Grain Ltd	Policy 2	Oppose	Delete.
210.41	Director-General of Conservation	Policy 2	Support	Retain.
265.33	Federated Farmers of NZ (Southland Province)	Policy 2	Oppose	Delete.
277.17	Fonterra Co-operative Group Ltd	Policy 2	Oppose in part	Amend the Policy to read – “Any assessment of an activity covered by this plan must: 1. take into account any relevant iwi management plan; and 2. assess water quality and quantity based on Ngāi Tahu indicators of health <u>as set out in Appendix XX.</u> ” Alternatively, 2 might read: “Assess water quality and quantity based on Ngāi Tahu indicators of health <u>as set out in any relevant iwi management plan</u> ”
288.9	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 2	Support in part	<b>Policy 2 – Take into account iwi management Plans</b> Any assessment of an activity covered by this plan must: 1. take into account any relevant iwi management plan; <del>and</del> <del>2. assess water quality and quantity based on Ngāi Tahu indicators of health.</del>
331.2	GRANT J J & J L	Policy 2	Amend	Amend to include “take into account”.
390.8	Horticulture NZ	Policy 2	Oppose	Delete Policy 2.
437.9	KEMPTHORNE Robert	Policy 2	Oppose in part	Amend Policy 2(2) So that any assessment is undertaken <b>in conjunction</b> with nationally recognised scientific measures of agreed water quality and quantity.
478.4	LOVERIDGE David	Policy 2	Support Amend	There is a need to be able to ensure new science will be added in the future.
481.2	Lowburn Dairy Farms	Policy 2	Amend	All applications & consents processed only by regional council, Iwi not to have input on individual applications and consents.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
661.11	Ravensdown Ltd	Policy 2	Neutral	Ravensdown seeks for clarification of the appropriateness of the Ngāi Tahu indicators of health to be used in a policy and other provisions in the Plan, and if they are to be used, would seek they be included by way of reference so they can be reviewed for their appropriateness to assess water quality. If they are not to be included by reference, then delete reference to them in the Plan.
712.11	Seaview Trust & Oraka Farms Ltd	Policy 2	Oppose	Reword to 'Give consideration of water quality based on Ngai Tahu Indicators of health'..
749.31	Southland Conservation Board	Policy 2	Support	Retain.
752.46	Southland Fish & Game Council	Policy 2	Support	Retain.
797.9	Nga Runanga and TRONT	Policy 2	Support	Retain.
802.5	The 254 Partnership & Gerken Family Trust	Policy 2		Clarify what Ngai Tahu indicators of health are.
877.9	WILSON Aaron	Policy 2	Support in part	Council and the Water and Land Plan should outline a collaborative process for the limit setting process.
880.14	WILSON Shannon	Policy 2	Support in part	Council and the Water and Land plan should outline a collaborative process for the limit setting process.
895.23	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 2	Amend	<p>Ensure assessments of water quality and quantity based on Ngai Tahu indicators under proposed Policy 2 are only where necessary due to the nature of the activity and the scale and potential significance of effects. This could be achieved by amending the policy as follows and relying on the provisions in the relevant iwi management plan.</p> <p><b>Policy 2 – Take into account iwi management plans</b></p> <p>Any assessment of an activity covered by this plan must:</p> <ol style="list-style-type: none"> <li>1. take into account any relevant iwi management plan; and</li> <li>2. assess water quality and quantity based on Ngai Tahu indicators of health.</li> </ol>

### Policy 3 – Ngai Tahu ki Murihiku taonga species

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.21	Aratiatia Livestock Ltd	Policy 3	Support	Retain.
108.21	BYTHELL Jesse	Policy 3	Support	Retain.
210.42	Director-General of Conservation	Policy 3	Support	Retain.
265.34	Federated Farmers of NZ (Southland Province)	Policy 3	Oppose	Delete
478.5	LOVERIDGE David	Policy 3	Support Amend	There is a need to be able to ensure new science will be added in the future.
481.3	Lowburn Dairy Farms	Policy 3	Amend	All applications and consents processed only by regional council, Iwi not to have input on individual applications and consents.
640.8	Pourakino Catchment Group	Policy 3	Amend	To manage activities that adversely affect taonga species identified in Appendix M <u>where resource consent is required for that activity.</u>
749.32	Southland Conservation Board	Policy 3	Support	Retain.
752.47	Southland Fish & Game Council	Policy 3	Support	Retain.
797.10	Nga Runanga and TRONT	Policy 3	Support in part	Amend policy 3 to read: To <u>avoid as a first priority or otherwise</u> manage activities that adversely affect taonga species, identified in Appendix M.
810.8	Three Rivers Catchment Group (TRCG)	Policy 3	Amend	To manage activities that adversely affect taonga species, identified in Appendix M <u>where resource consent is required for that activity.</u>
895.24	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 3	Support	Retain.

#### Policy 4 – Alpine

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.3	ADAMS A J & P G	Policy 4	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.8	Alliance Group Ltd	Policy 4	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.22	Aratiatia Livestock Ltd	Policy 4	Support	Retain.
48.11	Ballance Agri-Nutrients	Policy 4	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: "requiring implementation of good management practices." Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words 'strongly discouraging the granting of resource consents...' and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not.
64.1	BELGARD Family Trust (GA & JM Rauber)	Policy 4	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.1	BLACK Family Trust	Policy 4	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.2	BLAKELY Barney & Stephanie	Policy 4	Support	Retain.
81.5	BLAKELY Hamish & Hannah	Policy 4	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.3	BRENTLEIGH Family Trust	Policy 4	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.22	BYTHELL Jesse	Policy 4	Support	I support Policy 4, and to ensure the biodiversity, soil and water quality of the Alpine Zone are protected from the adverse effects of erosion and water quality degradation, I seek that

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultivation, the addition of fertiliser or burning in the Alpine Zone be non-complying activities. I seek clarification on why 800m was chosen as elevation for the Alpine Zone and suggest that 700m is a more appropriate elevation for Southland given the physiographic effects in the latitudes our region spans.
189.4	Dairy Holdings Ltd	Policy 4	Support	Retain policy 4 as notified. That the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.43	Director-General of Conservation	Policy 4	Support in part	Amend Policy 4 – Alpine to read: In the Alpine physiographic zone, avoid, remedy, or mitigate erosion and adverse effects on water quality from contaminants, by: <ol style="list-style-type: none"> <li>1. <u>Protecting, maintaining and enhancing the indigenous vegetation cover of the soil;</u></li> <li>2. <u>Avoiding land development in areas which will cause or accelerate soil erosion;</u></li> <li>3. requiring implementation of good management practices to manage erosion and adverse effects on water quality from contaminants transported via overland and lateral flow and <u>their inclusion in management plans;</u></li> <li>4. <u>strongly discourage the granting of resource consents having particular regard to which have significant adverse effects of contaminants transported via overland flow or lateral flow when assessing resource consent applications and preparing or considering management plans;</u></li> <li>5. prohibiting dairy farming, and intensive winter grazing and <del>strongly discouraging</del> the granting of resource consents for cultivation.</li> </ol>
265.35	Federated Farmers of NZ (Southland Province)	Policy 4	Oppose in part	Delete.
279.17	Forest & Bird NZ	Policy 4		Retain with amendment to prohibit dairy farming, intensive winter grazing and cultivation.
288.10	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 4	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.1	Glendhu Dairies Ltd	Policy 4	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
322.1	Glenlapa Station	Policy 4	Support	Continue working with our Land Sustainability Officer (LSO).
361.5	HBG AgriLimited	Policy 4(4)	Support	Support Policy 4 and ensure: <ul style="list-style-type: none"> <li>the duration sought by the applicant with supporting material, is a large driver of the consent duration.</li> <li>permanence and economic life is a key factor in determining the consent duration.</li> <li>that applicant's compliance with previous consents has a bearing on the term of the consent.</li> </ul>
369.1	HENDERSON Michael	Policy 4	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.4	Invercargill City Council	Policy 4		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.6	LOVERIDGE David	Policy 4	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.4	Ludell Ltd	Policy 4	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.1	McKelvie Ltd	Policy 4	Amend	Amend to improve accuracy.
547.2	MCMULLEN G F	Policy 4	Amend	Be able to change incorrect zones etc. by consultant etc.
555.2	MCRAE Daryl & Ruth	Policy 4	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.6	MOSEBY Ryan	Policy 4	Support	Retain.
590.1	Mt Linton Station	Policy 4	Support	Retain.
604.1	Nokomai Station Ltd	Policy 4	Oppose in part	Amend the policy to remove point three 'strongly discourage'.
640.9	Pourakino Catchment Group	Policy 4	Support	Retain section 1
661.12	Ravensdown Ltd	Policy 4	Support in part Amend	Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Policy 4 – Alpine</p> <p>In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> <p>Policy 5 – Old Mataura and Peat Wetlands In the Old Mataura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6</p> <p>In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices.</li> </ul>
664.12	Real Journeys Ltd	Policy 4	Support	Retain.
706.1	Sandy Creek Trust	Policy 4	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.12	Seaview Trust & Oraka Farms Ltd	Policy 4	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.1	Shallow Croft Ltd	Policy 4	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
733.3	SMITH Hamish & Karen	Policy 4		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
737.3	Smithill Ltd	Policy 4	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.33	Southland Conservation Board	Policy 4	Support	Retain.
752.48	Southland Fish & Game Council	Policy 4	Support Amend	Retain Policy 4 – Alpine as notified with the following amendments to Policy 4(2) and (3): <del>“2. Having particular regard to</del> <u>Strongly discourage the granting of resource consents that result in</u> adverse effects of contaminants, <u>including sediment</u> , transported via overland flow when assessing consent applications and preparing or considering management plans; <del>“3. Prohibiting dairy farming and, intensive winter grazing and strongly discourage the granting of resource consents for cultivation.”</del> Insert new numbered bullet point: <u>“4. Maintaining or enhancing indigenous vegetation cover, including tussock grasslands, where it exists.”</u>
771a.1	STEWART Grahame (Filwood Farm)	Policy 4	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.11	Nga Runanga and TRONT	Policy 4	Support in part	Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.  Amend policy 4 to read:  In the Alpine physiographic zone, avoid, remedy, or-mitigate erosion and adverse effects on water quality from contaminants, by:  1. requiring implementation of good management practices to manage erosion and adverse effects on water quality from contaminants transported via overland flow <u>and lateral drainage</u> ;  2. having particular regard to adverse effects of contaminants transported via overland flow <u>and lateral drainage</u> when assessing resource consent applications and preparing or considering management plans; ...  3. prohibiting dairy farming and intensive winter grazing and strongly discouraging the granting of resource consents for cultivation.
803.13	The Fertiliser Association of NZ	Policy 4	Oppose Amend	Delete Policies 4 to 12 and replace with the following:  <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>activities on water quality, by: .</p> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.9	Three Rivers Catchment Group (TRCG)	Policy 4	Support	Retain section 1.
811.1	THYS Herman & STAUT Tinneke	Policy 4	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
832.20	VAN GOOL Raewyn	Policy 4	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.6	WHITE John Copeland	Policy 4	Support in part Amend	<p>We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.</p> <p>We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.</p>
877.10	WILSON Aaron	Policy 4	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.15	WILSON Shannon	Policy 4	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

## Policy 5 – Central plains

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.4	ADAMS A J & P G	Policy 5	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.9	Alliance Group Ltd	Policy 5	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.23	Aratiatia Livestock Ltd	Policy 5	Support	Retain.
48.12	Ballance Agri-Nutrients	Policy 5	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: "requiring implementation of good management practices." Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words 'strongly discouraging the granting of resource consents...' and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.2	BELGARD Family Trust (GA & JM Rauber)	Policy 5	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.2	BLACK Family Trust	Policy 5	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.3	BLAKELY Barney & Stephanie	Policy 5	Support	Retain.
81.6	BLAKELY Hamish & Hannah	Policy 5	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.4	BRENTLEIGH Family Trust	Policy 5	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.23	BYTHELL Jesse	Policy 5	Support	Retain.
189.5	Dairy Holdings Ltd	Policy 5	Support	Retain policy 5 as notified that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.44	Director-General of Conservation	Policy 5	Support in part	Amend Policy 5 – Central Plains to read: In the Central Plains physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: 1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via artificial drainage, <del>and deep drainage</del> <u>and natural bypass flow and ensure these matters are considered when assessing resource consent applications and preparing or considering management plans;</u> 2. <del>having particular regard to strongly discouraging the granting of resource consent applications for activities which will have</del> adverse effects on the water quality from contaminants transported via artificial drainage, <del>and deep drainage</del> <u>and natural bypass flows when assessing resource consent applications and preparing or considering management plans.</u>
265.36	Federated Farmers of NZ (Southland Province)	Policy 5	Oppose in part	Delete.
288.11	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 5	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.2	Glendhu Dairies Ltd	Policy 5	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
369.2	HENDERSON Michael	Policy 5	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.5	Invercargill City Council	Policy 5		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.7	LOVERIDGE David	Policy 5	Support Amend	There is a need to be able to ensure new science will be added in the future.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
483.5	Ludell Ltd	Policy 5	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.2	McKelvie Ltd	Policy 5	Amend	Amend to improve accuracy.
547.3	MCMULLEN G F	Policy 5	Amend	Be able to change incorrect zones etc. by consultant etc.
555.3	MCRAE Daryl & Ruth	Policy 5	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.7	MOSEBY Ryan	Policy 5	Support	Retain.
640.10	Pourakino Catchment Group	Policy 5	Support	Retain section 1.
661.13	Ravensdown Ltd	Policy 5	Support in part Amend	Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:  Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants via overland flow, and</li> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> Policy 5 – Old Maitauru and Peat Wetlands In the Old Maitauru and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> Policy 6

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices.</li> </ul>
666.4	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 5	Support Oppose	Explanations on how physiographic zones are allocated need more community engagement. Farmers need a procedure to challenge Zones for their land.
706.2	Sandy Creek Trust	Policy 5	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.13	Seaview Trust & Oraka Farms Ltd	Policy 5	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.2	Shallow Croft Ltd	Policy 5	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
733.4	SMITH Hamish & Karen	Policy 5		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.4	Smithill Ltd	Policy 5	Support in part Amend	We support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.34	Southland Conservation Board	Policy 5	Support	Retain.
752.49	Southland Fish & Game Council	Policy 5	Support Amend	Retain Policy 5 – Central Plains as notified with the following amendment to Policy 5(2) and the following additional bullet point: <del>‘2. Having particular regard to</del> <u>Strongly discourage the granting of resource consents that result in adverse effects on water quality from contaminants, including nitrates, transported via artificial drainage and deep drainage when assessing consent applications and preparing or considering management plans;</u>  <u>3. Strongly discouraging the granting of resource consents to establish new, or further intensification of existing dairy farming of cows.’</u>
771.2	STEWART Family Trust (Trevor Stewart)	Policy 5	Amend	Make the farm plan as simple as possible for me to complete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
771a.2	STEWART Grahame (Filwood Farm)	Policy 5	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.12	Nga Runanga and TRONT	Policy 5		Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.  Amend policy to read:  In the Central Plains physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by:  1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via artificial drainage, <del>and</del> deep drainage <u>and lateral drainage</u> ;  having particular regard to adverse effects on water quality from contaminants transported via artificial drainage, <del>and</del> deep drainage <u>and lateral drainage</u> when assessing resource consent applications and preparing or considering management plans.
803.14	The Fertiliser Association of NZ	Policy 5	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u>  <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.10	Three Rivers Catchment Group (TRCG)	Policy 5	Support	Retain section 1.
811.2	THYS Herman & STAUT Tinneke	Policy 5	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
832.21	VAN GOOL Raewyn	Policy 5	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.7	WHITE John Copeland	Policy 5	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.11	WILSON Aaron	Policy 5	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.16	WILSON Shannon	Policy 5	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

### Policy 6 – Gleyed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.5	ADAMS A J & P G	Policy 6	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.10	Alliance Group Ltd	Policy 6	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.24	Aratiatia Livestock Ltd	Policy 6	Support	Retain.
48.13	Ballance Agri-Nutrients	Policy 6	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: "requiring implementation of good management practices." Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words 'strongly discouraging the granting of resource consents...' and replace with a



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.3	BELGARD Family Trust (GA & JM Rauber)	Policy 6	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.3	BLACK Family Trust	Policy 6	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.4	BLAKELY Barney & Stephanie	Policy 6	Support	Retain.
81.7	BLAKELY Hamish & Hannah	Policy 6	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.5	BRENTLEIGH Family Trust	Policy 6	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.24	BYTHELL Jesse	Policy 6	Support	Retain.
172.2	COWAN Les & Christine	Policy 6	Oppose	Define the word 'relevant' in these policies.
189.6	Dairy Holdings Ltd	Policy 6	Support	Retain policy 6 as notified - that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.45	Director-General of Conservation	Policy 6	Support in part	Amend Policy 6 – Gleyed to read: In the Gleyed physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: 1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via artificial drainage, <del>and</del> overland flow <u>and deep drainage in podsol soils</u> where relevant; 2. having particular regard to adverse effects on water quality from contaminants transported via artificial drainage, and overland flow where relevant when assessing resource consent applications and preparing or considering management plans.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>3. strongly discouraging the granting of resource consent applications for activities on podsol soils which will have adverse effects on the water quality from phosphorous transported via deep drainage.</u>
265.37	Federated Farmers of NZ (Southland Province)	Policy 6	Oppose in part	Delete.
288.12	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 6	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.3	Glendhu Dairies Ltd	Policy 6	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
322.2	Glenlapa Station	Policy 6	Support	Continue working with our Land Sustainability Officer (LSO).
334.1	Greenvale Station Ltd	Policy 6	Oppose	We do not agree with the physiographical areas mapped for our property.
369.3	HENDERSON Michael	Policy 6	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
381.4	HOLDER Wendy & Tom	Policy 6	Oppose	If classification is necessary way forward for ES then in-depth scientific classification of each property title is required. If classification of an area as non dairy farming, then ES needs to make no exemptions to this. Therefore, no existing or proposed (as in the dairy hub) should be exempt. There cannot be exemptions, same for all.
390.9	Horticulture NZ	Policy 6	Support	Retain Policy 6.
411.6	Invercargill City Council	Policy 6		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.8	LOVERIDGE David	Policy 6	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.6	Ludell Ltd	Policy 6	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.3	McKelvie Ltd	Policy 6	Amend	Amend to improve accuracy.
547.4	MCMULLEN G F	Policy 6	Amend	Be able to change incorrect zones etc. by consultant etc.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
555.4	MCRAE Daryl & Ruth	Policy 6	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.8	MOSEBY Ryan	Policy 6	Support	Retain.
640.11	Pourakino Catchment Group	Policy 6	Support	Retain section 1.
661.14	Ravensdown Ltd	Policy 6	Support in part Amend	<p>Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:</p> <p>Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> <p>Policy 5 – Old Maitaura and Peat Wetlands In the Old Maitaura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6 In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices.</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
666.5	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 6	Support Oppose	Explanations on how physiographic zones are allocated need more community engagement. Farmers need a procedure to challenge Zones for their land.
706.3	Sandy Creek Trust	Policy 6	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.14	Seaview Trust & Oraka Farms Ltd	Policy 6	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.3	Shallow Croft Ltd	Policy 6	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
726.1	Slattery Trust	Policy 6	Oppose	Water quality needs to be maintained by the whole of Southland with the same rules and conditions, not just one or two physiographic zones taking the brunt of having non-complying activities installed upon them.
733.5	SMITH Hamish & Karen	Policy 6		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.5	Smithill Ltd	Policy 6	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.35	Southland Conservation Board	Policy 6	Support	Retain.
752.50	Southland Fish & Game Council	Policy 6	Support	Retain.
771.3	STEWART Family Trust (Trevor Stewart)	Policy 6	Amend	Make the farm plan as simple as possible for me to complete.
771a.3	STEWART Grahame (Filwood Farm)	Policy 6	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.13	Nga Runanga and TRONT	Policy 6		Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.
803.15	The Fertiliser Association of NZ	Policy 6	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> .

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>managing the transport of contaminants, and</li> <li>implementing Good Management practices, and</li> </ul> <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u>
810.11	Three Rivers Catchment Group (TRCG)	Policy 6	Support	Retain section 1.
811.3	THYS Herman & STAUT Tinneke	Policy 6	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
832.22	VAN GOOL Raewyn	Policy 6	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.8	WHITE John Copeland	Policy 6	Support in part Amend	<p>We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.</p> <p>We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.</p>
877.12	WILSON Aaron	Policy 6	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.17	WILSON Shannon	Policy 6	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

## Policy 7 – Bedrock/hill country

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.6	ADAMS A J & P G	Policy 7	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.11	Alliance Group Ltd	Policy 7	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.25	Aratiatia Livestock Ltd	Policy 7	Support	We are concerned at the potential adverse impact on our grazier's business, of imposing a 50ha cap on our grazier's wintering activities. We question whether the proposal is fair.
48.14	Ballance Agri-Nutrients	Policy 7	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: "requiring implementation of good management practices." Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words 'strongly discouraging the granting of resource consents...' and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.4	BELGARD Family Trust (GA & JM Rauber)	Policy 7	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.4	BLACK Family Trust	Policy 7	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.5	BLAKELY Barney & Stephanie	Policy 7	Support in part	Retain and delete consent requirements for farmers using traditional practices. Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan. Note that farmers using traditional farming practices should not have to apply for resource consent to winter capital stock. Farm management plans should not be a requirement

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.6	BRENTLEIGH Family Trust	Policy 7	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.25	BYTHELL Jesse	Policy 7	Support	Retain.
172.3	COWAN Les & Christine	Policy 7	Oppose	Define the word 'relevant' in these policies.
189.7	Dairy Holdings Ltd	Policy 7	Support	Retain policy 7 as notified. that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.46	Director-General of Conservation	Policy 7	Support in part	Amend Policy 7 – Bedrock/Hill Country to read In the Bedrock/Hill Country physiographic zone, avoid, remedy, or mitigate erosion and adverse effects on water quality from contaminants, by: <u>1. maintaining the indigenous vegetation cover where it is present;</u> <del>1. 2.</del> requiring implementation of good management practices to manage erosion and adverse effects on water quality from contaminants transported via overland flow, <del>and</del> artificial drainage <u>and restricting new tile drainage and management of catchments of streams which recharge aquifers</u> where relevant; <del>2. 3.</del> having particular regard to adverse effects on water quality from contaminants transported via overland flow <del>and</del> artificial drainage <u>and in particular new tile drainage and streams that recharge aquifers</u> where relevant when assessing resource consent applications and preparing or considering management plans. <del>4. strongly discourage</del> activities which increase the quantity of contaminants transported by <u>overland flow to water</u>
265.38	Federated Farmers of NZ (Southland Province)	Policy 7	Oppose in part	Delete.
288.13	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 7	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.4	Glendhu Dairies Ltd	Policy 7	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
322.3	Glenlapa Station	Policy 7	Support	Continue working with our Land Sustainability Officer (LSO).
358.7	HASTIE Stephen	Policy 7	Oppose	Not to be assessed or fill out consents for the choices that we make for our own farm entity/business.
369.4	HENDERSON Michael	Policy 7	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.7	Invercargill City Council	Policy 7		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.9	LOVERIDGE David	Policy 7	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.7	Ludell Ltd	Policy 7	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.4	McKelvie Ltd	Policy 7	Amend	Amend to improve accuracy.
546.1	MCMEEKEN George & Terry	Policy 7	Oppose	To get a consent to change farm practices in this area would be very difficult. Surely a better way to do this would be to work with soil types as opposed to physiographic zones.
547.5	MCMULLEN G F	Policy 7	Amend	Be able to change incorrect zones etc. by consultant etc.
555.5	MCRAE Daryl & Ruth	Policy 7	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.9	MOSEBY Ryan	Policy 7	Support	Retain.
592.1	Mt Peel Ltd	Policy 7	Amend	As an alternative I propose: <ul style="list-style-type: none"> <li>We need to work with someone to identify the more riskier areas of our farm.</li> <li>Everyone's farms are different and areas within farms are different. There can't be one set rule it needs to be flexible.</li> </ul>
616.2	O'CONNELL Elizabeth	Policy 7	Amend	That the Bedrock / Hill Country zone be differentiated at 300m above sea level and recognition made of the more extensive farming practices above this level and the good management practice of intensive wintering of only sheep and young cattle. Older cattle in this area are traditionally extensively wintered on tussock blocks.
640.12	Pourakino Catchment Group	Policy 7	Support	Retain section 1.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
655.1	RABBIDGE Dean	Policy 7	Support	Retain.
661.15	Ravensdown Ltd	Policy 7	Support in part Amend	<p>Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:</p> <p>Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> <p>Policy 5 – Old Mataura and Peat Wetlands In the Old Mataura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6 In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> </ul> <p>Implementing Industry Agreed Good Management Practices.</p>
706.4	Sandy Creek Trust	Policy 7	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.15	Seaview Trust & Oraka Farms Ltd	Policy 7	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.4	Shallow Croft Ltd	Policy 7	Oppose	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	Physiographic Zones at the expense of Environment Southland.
733.6	SMITH Hamish & Karen	Policy 7		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.6	Smithill Ltd	Policy 7	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.36	Southland Conservation Board	Policy 7	Support	Retain.
752.51	Southland Fish & Game Council	Policy 7	Support	Retain Policy 7 – Bedrock / Hill Country as notified with the following amendments to Policy 7(2) and (3): <del>“2. Having particular regard to</del> Strongly discourage the granting of resource consents that result in adverse effects of contaminants, including sediment, transported via overland flow and artificial drainage where relevant when assessing consent applications and preparing or considering management plans; Insert new numbered bullet point: <del>“3. Maintaining or enhancing indigenous vegetation cover, including tussock grasslands, where it exists.”</del>
771.4	STEWART Family Trust (Trevor Stewart)	Policy 7	Amend	Make the farm plan as simple as possible for me to complete.
771a.4	STEWART Grahame (Filwood Farm)	Policy 7	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
779.1	Strathallan Trust	Policy 7	Support	Retain.
797.14	Nga Runanga and TRONT	Policy 7		Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.
803.16	The Fertiliser Association of NZ	Policy 7	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>area.</u>
810.12	Three Rivers Catchment Group (TRCG)	Policy 7	Support	Retain section 1.
811.4	THYS Herman & STAUT Tinneke	Policy 7	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
832.23	VAN GOOL Raewyn	Policy 7	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.9	WHITE John Copeland	Policy 7	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.13	WILSON Aaron	Policy 7	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.18	WILSON Shannon	Policy 7	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

### Policy 8 – lignite-marine terraces

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.7	ADAMS A J & P G	Policy 8	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.12	Alliance Group Ltd	Policy 8	Oppose in	Make amendments to these policies to ensure it is clear what activities they are to be applied to

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.26	Aratiatia Livestock Ltd	Policy 8	Support	Retain.
48.15	Ballance Agri-Nutrients	Policy 8	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: “ <u>requiring implementation of good management practices.</u> ” Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words ‘strongly discouraging the granting of resource consents...’ and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.5	BELGARD Family Trust (GA & JM Rauber)	Policy 8	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.5	BLACK Family Trust	Policy 8	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.6	BLAKELY Barney & Stephanie	Policy 8	Support	Retain.
81.8	BLAKELY Hamish & Hannah	Policy 8	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.7	BRENTLEIGH Family Trust	Policy 8	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.26	BYTHELL Jesse	Policy 8	Support	Retain.
172.4	COWAN Les & Christine	Policy 8	Oppose	Define the word ‘relevant’ in these policies.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
189.8	Dairy Holdings Ltd	Policy 8	Support	Retain policy 8 as notified - that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.47	Director-General of Conservation	Policy 8	Support in part	Amend Policy 8 – Lignite-Marine Terraces to read: In the Lignite–Marine Terraces physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: 1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via overland flow <del>and</del> artificial drainage <u>and deep drainage to aquifers and in particular consider the use of wetlands to reduce nitrogen losses to surface water</u> where relevant; 2. having particular regard to adverse effects on water quality from contaminants transported via overland flow <del>and</del> artificial drainage <u>and deep drainage to aquifers</u> where relevant when assessing resource consent applications and preparing or considering management plans.
265.39	Federated Farmers of NZ (Southland Province)	Policy 8	Oppose in part	Delete.
288.14	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 8	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.5	Glendhu Dairies Ltd	Policy 8	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
369.5	HENDERSON Michael	Policy 8	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.8	Invercargill City Council	Policy 8		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.10	LOVERIDGE David	Policy 8	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.8	Ludell Ltd	Policy 8	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.5	McKelvie Ltd	Policy 8	Amend	Amend to improve accuracy.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
547.6	MCMULLEN G F	Policy 8	Amend	Be able to change incorrect zones etc. by consultant etc.
555.6	MCRAE Daryl & Ruth	Policy 8	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.10	MOSEBY Ryan	Policy 8	Support	Retain.
640.13	Pourakino Catchment Group	Policy 8	Support	Retain section 1.
661.16	Ravensdown Ltd	Policy 8	Support in part Amend	Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:  Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> Policy 5 – Old Mataura and Peat Wetlands In the Old Mataura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> Policy 6 In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>Implementing Industry Agreed Good Management Practices.</li> </ul>
706.5	Sandy Creek Trust	Policy 8	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.16	Seaview Trust & Oraka Farms Ltd	Policy 8	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.5	Shallow Croft Ltd	Policy 8	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
733.7	SMITH Hamish & Karen	Policy 8		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.7	Smithill Ltd	Policy 8	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.37	Southland Conservation Board	Policy 8	Support	Retain.
752.52	Southland Fish & Game Council	Policy 8	Support	Retain.
771.5	STEWART Family Trust (Trevor Stewart)	Policy 8	Amend	Make the farm plan as simple as possible for me to complete.
771a.5	STEWART Grahame (Filwood Farm)	Policy 8	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.15	Nga Runanga and TRONT	Policy 8		<p>Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.</p> <p>Amend policy read:</p> <p>In the Lignite–Marine Terraces physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by:</p> <ol style="list-style-type: none"> <li>requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via overland flow, <del>and</del> artificial drainage, <u>deep drainage and lateral drainage where relevant</u>;</li> </ol> <p>having particular regard to adverse effects on water quality from contaminants transported via overland flow, <del>and</del> artificial drainage, <u>deep drainage and lateral drainage where relevant</u> when</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				assessing resource consent applications and preparing or considering management plans.
803.17	The Fertiliser Association of NZ	Policy 8	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.13	Three Rivers Catchment Group (TRCG)	Policy 8	Support	Retain section 1.
811.5	THYS Herman & STAUT Tinneke	Policy 8	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
832.24	VAN GOOL Raewyn	Policy 8	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.10	WHITE John Copeland	Policy 8	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.14	WILSON Aaron	Policy 8	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.19	WILSON Shannon	Policy 8	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.



## Policy 9 – Old Mataura

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.8	ADAMS A J & P G	Policy 9	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.13	Alliance Group Ltd	Policy 9	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.27	Aratiatia Livestock Ltd	Policy 9	Support	Retain.
25.6	Ardel Dairies Ltd	Policy 9	Oppose in part	Delete "strongly discourage the granting of consents".
47.3	Balfour, Wendonside & Waikaia Group	Policy 9	Oppose in part	Delete Policy 9(3).
48.16	Ballance Agri-Nutrients	Policy 9	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: " <u>requiring implementation of good management practices.</u> " Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words 'strongly discouraging the granting of resource consents...' and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.6	BELGARD Family Trust (GA & JM Rauber)	Policy 9	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.6	BLACK Family Trust	Policy 9	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.7	BLAKELY Barney &	Policy 9	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Stephanie			
81.9	BLAKELY Hamish & Hannah	Policy 9	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.8	BRENTLEIGH Family Trust	Policy 9	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan. Old Mataura should be considered the same as Oxidising Zone and #3 under Policy 9 be removed.
91.1	Bridesdale Farming	Policy 9	Oppose	No specific decision requested.
94.1	Brooklea Farm Ltd	Policy 9	Oppose	Would support Old Mataura rules being classed the same as other zones until the link between what we do on farm and what is happening to water quality is measured over time, more actual, less model. More intensive monitoring of all potential points of pollution especially rural towns that lack proper sewerage schemes.
108.27	BYTHELL Jesse	Policy 9	Support	Retain.
148.2	CLEMENT Paul & Linda	Policy 9	Oppose	We would like to see Point 3 in Policy 9 removed until further research has been conducted on physiographic zones.
189.9	Dairy Holdings Ltd	Policy 9	Support	Retain policy 9 as notified - that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
193.1	David McKee Farms Ltd	Policy 9	Oppose	Amend mapping to give a lot more weight to the soil types that Topoclimate observed.
205.6	Dillon Ag Ltd (Chris Dillon)	Policy 9	Oppose	Old Mataura should be considered the same as Oxidising Zone and #3 under Policy 9 be removed.
206.6	Dillon Ag Ltd (Rochelle Dillon)	Policy 9	Oppose	Old Mataura should be considered the same as Oxidising Zone and #3 under Policy 9 be removed.
210.48	Director-General of Conservation	Policy 9	Support	Retain.
211.1	DITCHFIELD Dylan	Policy 9	Oppose	I recommend that the words "Strongly discourage the granting of consents" be taken out.
220.6	Drylands Farming Ltd	Policy 9	Oppose	Amend the policy to remove point 3, "strongly discourage the granting of consents".
221.6	DRYSDALE Family Trust	Policy 9	Oppose	Amend the policy to remove point 3, "strongly discourage the granting of consents".
258.4	Eyre Creek Ltd	Policy 9	Oppose	'Old Mataura' should be in the same consent category as riverine, gleyed, oxidising, central plains, lignite marine terraces and bedrock/hill for new or expanded dairy farming and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				additional intensive winter grazing, restrictions on expanded dairy farms and additional winter grazing activities in all these zones should be relaxed to a restricted discretionary activity until we have a firm grasp of this issue. Remove point 3 from policy 9.
259.2	F D Enterprises Ltd	Policy 9	Oppose in part	Remove the wording strongly discourage the granting of resource consent.
264.2	FarmRight Ltd	Policy 9	Amend	Remove the wording “strongly discourage” the granting of resource consent.
265.40	Federated Farmers of NZ (Southland Province)	Policy 9	Oppose in part	Delete.
277.18	Fonterra Co-operative Group Ltd	Policy 9	Oppose in part	Amend policies 9 and 11 to remove the focus on “strongly discouraging the granting of resource consents for additional dairy farming” and instead focus on the effects of additional dairy farming that would not be considered acceptable. This might include reframing the policy so that it gives a clear direction that additional dairy farming will not be allowed where the systems and practices used allow for adverse effects to occur.
279.18	Forest & Bird NZ	Policy 9		Retain with amendment to prohibit dairy farming, intensive winter grazing and cultivation.
288.15	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 9	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.6	Glendhu Dairies Ltd	Policy 9	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
322.4	Glenlapa Station	Policy 9	Oppose	Amend submitters land currently classified “Old Maitaia” to be re-classified as “Gleyed”.
331.3	GRANT J J & J L	Policy 9	Oppose	Remove “strongly discourage the granting of consents”.
369.6	HENDERSON Michael	Policy 9	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened. The wording ‘strongly discouraging’ should be removed.
382.1	HOLLAND B J & R A Partnership	Policy 9(3)	Oppose	Consents for activities on Old Maitaia soils should be allowed under close supervision. Test more bores to confirm appropriate physiographic zoning

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
384.1	HOPCROFT Bevan & Wendy	Policy 9	Oppose	More research and scientific data needs to be done before any decisions are made. This includes economic results on the impact the plan would have on this area.
411.9	Invercargill City Council	Policy 9		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
419.1	J R & D M Smith Ltd	Policy 9	Oppose in part	Amend the policy to remove point three.
442.1	KING Elliot	Policy 9	Oppose	No specific decision requested.
464.4	Landpro Ltd	Policy 9	Oppose in part	Amend the policy to remove point three <u>strongly discourage the granting of consents.</u>
467.5	Lawrence Farms Ltd (Gavin Lawrence)	Policy 9	Oppose	Assess each farm and its possible effects and base it on better science. The use of 'Grandparenting' is very unfair. Work needs to be done on the economic effects.
478.11	LOVERIDGE David	Policy 9	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.9	Ludell Ltd	Policy 9	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
487.2	M K H Farming Ltd	Policy 9	Oppose Amend	Amend the policy by removing part 3 strongly discourage the granting of consents.
498.1	MANN Alistair	Policy 9	Oppose	Amend the policy to remove clause three of Policy 9.
531.1	McKee Highview Ltd	Policy 9	Oppose	Remove the restrictions regarding the 'strongly discouraged' granting of consents.
532.1	MCKEE M & C Family Partnership	Policy 9	Oppose	Old Mataura – should be treated the same as the other 4 Physiographic Zones that are susceptible to nutrient loss.
533.1	MCKEE Rebecca	Policy 9	Oppose	Delete the restrictions regarding the 'strongly discouraged' granting of consents.
535.3	MCKEE Tyler	Policy 9	Oppose	Old Mataura should not be treated any different as any other 4 physiographic zones that are also susceptible to nutrient loss.
536.6	McKelvie Ltd	Policy 9	Amend	Amend to improve accuracy.
545.3	MCLEOD Emma	Policy 9	Oppose	Remove point 3 from policy 9.
547.7	MCMULLEN G F	Policy 9	Amend	Be able to change incorrect zones etc. by consultant etc.
555.7	MCRAE Daryl & Ruth	Policy 9	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
569.3	MILLER R J Trust	Policy 9	Oppose in part	Amend the policy to remove point 3, “strongly discourage the granting of consents”.
583.11	MOSEBY Ryan	Policy 9	Support	Retain.
590.2	Mt Linton Station	Policy 9	Oppose	For Old Mataura, and Peat types, existing land use should be allowed but a gradual phasing or change of practice favoured. Farm Plans should be used as an approach to make sure good management practices is implemented and risk identified and mitigation put in place in a reasonable and practical timeframe that fits farming budgets.
624.1	Paraemara Ltd	Policy 9	Oppose	ES needs to test and be 100% certain where these areas are. Should not be left to land owner to prove it or pay for it. Need to do a case study over time to prove whether or not Old Mataura is sustainable or not. Going on information available not long term until information is accurately gathered, close to 100%, then this zone should be treated with the same rules as the others.
640.14	Pourakino Catchment Group	Policy 9	Support	Retain section 1.
655.2	RABBIDGE Dean	Policy 9	Support	Retain.
661.17	Ravensdown Ltd	Policy 9	Support in part Amend	<p>Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:</p> <p>Policy 4 – Alpine</p> <p>In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> <p>Policy 5 – Old Mataura and Peat Wetlands In the Old Mataura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6</p> <p>In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices.</li> </ul>
670.2	ROBB Tony & Jill Family Trust	Policy 9	Amend	Give farmers clarification on the consequences that will occur to having Old Mataura in their property.
681.6	Rockytommy Farming Ltd	Policy 9	Oppose in part	Amend the policy to remove point three, <u>strongly discourage the granting of consents.</u>
682.3	Rokenwai Farming Ltd	Policy 9	Oppose in part	Amend the policy to remove point three, <u>strongly discourage the granting of consents.</u>
706.6	Sandy Creek Trust	Policy 9	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.17	Seaview Trust & Oraka Farms Ltd	Policy 9	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.6	Shallow Croft Ltd	Policy 9	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
726.2	Slattery Trust	Policy 9	Oppose	<p>Water quality needs to be maintained by the whole of Southland with the same rules and conditions, not just one or two physiographic zones taking the brunt of having non-complying activities installed upon them.</p> <p>We need a mechanism in the plan to prove our land or quantity of land is within the correct zone. This plan needs to be easy to understand. The mechanism needs to be easily understood and of no extra cost to land owners.</p>
729.1	SMAILL C F & A S Trust	Policy 9	Oppose	Oppose part of our property being classed Old Mataura.
733.8	SMITH Hamish & Karen	Policy 9		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
737.8	Smithill Ltd	Policy 9	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.38	Southland Conservation Board	Policy 9	Support	Retain.
752.53	Southland Fish & Game Council	Policy 9	Support	Retain Policy 9 – Old Mataura as notified with the following amendment to Policy 9(2): “2. <del>Having particular regard to</del> <u>Strongly discourage the granting of resource consents that result in</u> adverse effects of contaminants, <u>including nitrates</u> , transported via deep drainage when assessing consent applications and preparing or considering management plans;
759.3	Springlands Group Ltd	Policy 9	Oppose in part	Amend the policy to remove point three, <u>strongly discourage the granting of consents.</u>
766.1	STEVENS Brendon	Policy 9	Oppose	Remove 9(3).
771.6	STEWART Family Trust (Trevor Stewart)	Policy 9	Amend	Make the farm plan as simple as possible for me to complete.
771a.6	Stewart Grahame (Filwood Farm)	Policy 9	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
772.1	STEWART Ronald	Policy 9	Oppose	Remove physiographic zones OR have the ability to contest physiographic zones. Pay compensation to farming businesses and landowners for the loss of capital value.
773.1	STEWART Rory	Policy 9	Oppose	Have the ability to contest physiographic zones. Allow new dairying to be permitted and pay compensation to landholders and owners for the depreciation in land values and farming business.
797.16	Nga Runanga and TRONT	Policy 9		Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.
802.6	The 254 Partnership & Gerken Family Trust	Policy 9	Oppose	No specific decision requested.
803.18	The Fertiliser Association of NZ	Policy 9	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.14	Three Rivers Catchment Group (TRCG)	Policy 9	Support	Retain section 1.
811.6	THYS Herman & STAUT Tinneke	Policy 9	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
820.3	TOPHAM Jeanette	Policy 9	Oppose	Remove point 3 from Policy 9. Allow time, give all zones five years for the changes made due to Farm Environment Plans and Management Plans to affect water quality and then re-evaluate.
822.2	Tremaine Farming Partnership	Policy 9	Oppose	Remove number 3, that the granting of resource consents is to be strongly discouraged.
832.25	VAN GOOL Raewyn	Policy 9	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
840.4	W & B Clarke & Son Ltd	Policy 9		<p>Considering the relatively small areas of both the Peat Wetlands and The Old Mataura Physiographic zones (less than 3% of the total land), the relatively small rate of change regulations in these areas will have on improving water quality in southland and the fact that these areas are generally concentrated and regulations have the potential to make farming operations within these zones unviable we believe there needs to be a mechanism for farm by farm assessment where the true cost of the proposed regulations to that farming operation are considered and individual plans developed in consultation with Environment Southland not a one shoe fits all regulatory approach with the potential to ruin livelihoods.</p> <p>At the very least the implementation timeframes for both these zones needs to be reviewed so farmers can have time to make plans and implement changes over time allowing them to move forward gradually and lessening the immediate financially impact ultimately allowing them to make change whilst still having a financially viable business. We suggest an implementation of regulations to these zones by 2025.</p>
861.11	WHITE John Copeland	Policy 9	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
868.8	Wilkins Farming Ltd	Policy 9	Oppose	Remove point 3 from policy 9.
869.1	WILKINS Pam	Policy 9(3)	Amend	Remove point 3 of Policy 9.
877.15	WILSON Aaron	Policy 9	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to “hold the line.”
880.20	WILSON Shannon	Policy 9	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to “hold the line.” The W&L plan needs to include these amendments.

### Policy 10 – Oxidising

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.9	ADAMS A J & P G	Policy 10	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.14	Alliance Group Ltd	Policy 10	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve ‘good management practices’.
24.28	Aratiatia Livestock Ltd	Policy 10	Support	We submit that before ES imposes a blanket “oxidising” description to our property, the soil should be reassessed. The addition of the following: “3. Discouraging the granting of resource consents for additional dairy farming of cows and additional intensive winter grazing.” We ask that ES clarify the rationale for the difference in treatment within the proposed plan of Old Matura, Oxidising and Riverine physiographic zones.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.17	Ballance Agri-Nutrients	Policy 10	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: “ <u>requiring implementation of good management practices.</u> ” Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words ‘strongly discouraging the granting of resource consents...’ and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.7	BELGARD Family Trust (GA & JM Rauber)	Policy 10	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.7	BLACK Family Trust	Policy 10	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.8	BLAKELY Barney & Stephanie	Policy 10	Support	Retain.
81.10	BLAKELY Hamish & Hannah	Policy 10	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.9	BRENTLEIGH Family Trust	Policy 10	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.28	BYTHELL Jesse	Policy 10	Support	Retain.
172.5	COWAN Les & Christine	Policy 10	Oppose	Define the word ‘relevant’ in these policies.
189.10	Dairy Holdings Ltd	Policy 10	Support	Retain policy 10 as notified - that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.49	Director-General of	Policy 10	Support in part	Amend Policy 10 – Oxidising to read:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Conservation			In the Oxidising physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: 1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via deep drainage, and overland flow and artificial drainage where relevant; 2. having particular regard to adverse effects on water quality from contaminants <u>apart from nitrates</u> transported via deep drainage, and overland flow and artificial drainage where relevant when assessing resource consent applications and preparing or considering management plans; <u>3. strongly discouraging the granting of resource consent applications for activities which will have adverse effects on the water quality from nitrates transported via deep drainage and all contaminants transported by overland flow and artificial drainage.</u>
265.41	Federated Farmers of NZ (Southland Province)	Policy 10	Oppose in part	Delete.
279.19	Forest & Bird NZ	Policy 10		Retain with amendment to prohibit dairy farming, intensive winter grazing and cultivation.
288.16	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 10	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.7	Glendhu Dairies Ltd	Policy 10	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
358.8	HASTIE Stephen	Policy 10	Oppose	True and correct mapping needs to be carried out.
369.7	HENDERSON Michael	Policy 10	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
381.5	HOLDER Wendy & Tom	Policy 10		If classification is necessary way forward for ES then in-depth scientific classification of each property title is required. If classification of an area as non dairy farming, then ES needs to make no exemptions to this. Therefore, no existing or proposed (as in the dairy hub) should be exempt. There cannot be exemptions, same for all.
390.10	Horticulture NZ	Policy 10	Support	Retain.
411.10	Invercargill City Council	Policy 10		That discharge limits are open for public submission and are backed by scientific and industry

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				evidence as practicable and economically viable.
478.12	LOVERIDGE David	Policy 10	Support Amend	There is a need to be able to ensure new science will be added in the future.
479.1	Lowburn Ag Ltd (Birgit Pemberton)	Policy 10	Support	Retain.
480.1	Lowburn Ag Ltd (Jonathan Pemberton)	Policy 10	Support	Retain.
483.10	Ludell Ltd	Policy 10	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
484.1	M A Beer & Sons	Policy 10	Oppose	Remove reference to artificial drainage.
536.7	McKelvie Ltd	Policy 10	Amend	Amend to improve accuracy.
547.8	MCMULLEN G F	Policy 10	Amend	Be able to change incorrect zones etc. by consultant etc.
555.8	MCRAE Daryl & Ruth	Policy 10	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.12	MOSEBY Ryan	Policy 10	Support	Retain.
640.15	Pourakino Catchment Group	Policy 10	Support	Retain section 1.
655.3	RABBIDGE Dean	Policy 10	Support	Retain.
661.18	Ravensdown Ltd	Policy 10	Support in part Amend	Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:  Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants via overland flow, and</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> <p>Policy 5 – Old Maitaura and Peat Wetlands In the Old Maitaura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6 In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> <li>Implementing Industry Agreed Good Management Practices.</li> </ul>
666.6	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 10	Support Oppose	Explanations on how physiographic zones are allocated need more community engagement. Farmers need a procedure to challenge Zones for their land.
685.1	Rosebrae Farm Ltd	Policy 10	Support	Retain.
706.7	Sandy Creek Trust	Policy 10	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.18	Seaview Trust & Oraka Farms Ltd	Policy 10	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.7	Shallow Croft Ltd	Policy 10	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
726.3	Slattery Trust	Policy 10	Oppose	Water quality needs to be maintained by the whole of Southland with the same rules and conditions, not just one or two physiographic zones taking the brunt of having non-complying activities installed upon them.
733.9	SMITH Hamish & Karen	Policy 10		Amend to allow a provision for a landowner to seek reclassification of their farm's

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				physiographic zone by an independent source should the original zoning be in doubt.
737.9	Smithill Ltd	Policy 10	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.39	Southland Conservation Board	Policy 10	Support	Retain.
752.54	Southland Fish & Game Council	Policy 10	Support Amend	Retain Policy 10 – Oxidising as notified with the following amendment to Policy 10(2) and addition of the following bullet point: <del>“2. Having particular regard to</del> Strongly discourage the granting of resource consents that result in adverse effects of contaminants, <u>including nitrates</u> , transported via deep drainage, and overland flow and artificial drainage where relevant when assessing consent applications and preparing or considering management plans;  <u>“3. Strongly discouraging the granting of resource consents for new, or further intensification of existing dairy farming of cows and additional intensive winter grazing.”</u>
771.7	STEWART Family Trust (Trevor Stewart)	Policy 10	Amend	Make the farm plan as simple as possible for me to complete.
771a.7	STEWART Grahame (Filwood Farm)	Policy 10	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.17	Nga Runanga and TRONT	Policy 10	Support in part	Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health  Amend to read:  In the Oxidising physiographic zone, avoid <u>or</u> remedy, <del>or mitigate</del> adverse effects on water quality from contaminants, by:  1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via deep drainage, <u>and overland flow and artificial drainage where relevant</u> ;  2. having particular regard to adverse effects on water quality from contaminants transported via deep drainage, <u>and overland flow and artificial drainage where relevant</u> when assessing resource consent applications and preparing or considering management plans;  3. <u>Strongly discouraging the granting of resource consents for new or additional dairy farming of cows and additional winter grazing.</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
803.19	The Fertiliser Association of NZ	Policy 10	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.15	Three Rivers Catchment Group (TRCG)	Policy 10	Support	Retain section 1.
811.7	THYS Herman & STAUT Tinneke	Policy 10	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
816.1	TIPPETT Christie	Policy 10	Support	Retain.
817.1	Tomogalak Gorge Trust (Jeffery Keen)	Policy 10	Oppose	I would like to see more research done on physiographic zoning and if only a small percentage of the farm is in oxidising zone, this should not restrict winter grazing on the total area of the farm.
832.26	VAN GOOL Raewyn	Policy 10	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.12	WHITE John Copeland	Policy 10	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.16	WILSON Aaron	Policy 10	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.21	WILSON Shannon	Policy 10	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to “hold the line.” The W&L plan needs to include these amendments.

### Policy 11 – Peat wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.10	ADAMS A J & P G	Policy 11	Amend	Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.
17.15	Alliance Group Ltd	Policy 11	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve ‘good management practices’.
24.29	Aratiatia Livestock Ltd	Policy 11	Support	Retain.
48.18	Ballance Agri-Nutrients	Policy 11	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: “ <u>requiring implementation of good management practices.</u> ” Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words ‘strongly discouraging the granting of resource consents...’ and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.8	BELGARD Family Trust (GA & JM Rauber)	Policy 11	Oppose Amend	Each farming practice should be looked at on its own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in their potential use.
73.8	BLACK Family Trust	Policy 11	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				accordingly.
80.9	BLAKELY Barney & Stephanie	Policy 11	Support	Retain.
81.11	BLAKELY Hamish & Hannah	Policy 11	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.10	BRENTLEIGH Family Trust	Policy 11	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.29	BYTHELL Jesse	Policy 11	Support	Retain.
155.2	Coasthaven Farms Ltd & Paterson Gavara Trust	Policy 11	Oppose	Acknowledgment of developmental status and range of soils within the zone. Particularly with regard to P retention, organic matter and other soil defining characteristics. Consideration and acknowledgment of a coastal property which drains to the ocean.
189.11	Dairy Holdings Ltd	Policy 11		Amend Policy 11(3): strongly discouraging the granting of resource consents for additional dairy farming of cows and additional intensive winter grazing; <u>where it will have adverse environmental effects that cannot be avoided, remedied or mitigated.</u>
210.50	Director-General of Conservation	Policy 11	Support in part	Amend Policy 11 – Peat Wetlands to read: In the Peat Wetlands physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: + 1. <u>maintaining the integrity of wetlands and in particular its indigenous vegetation cover;</u> 2. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via artificial drainage, deep drainage, and lateral drainage <u>and the inclusion of these management practices in management plans;</u>  <del>3.strongly discourage the granting of resource consents for applications having particular regard to</del> which have adverse effects on water quality from contaminants transported via artificial drainage, deep drainage, and lateral drainage; <del>when assessing resource consent applications and preparing or considering management plans;</del> 4. Ensure no resource consents are granted <del>strongly discouraging the granting of resource consents</del> for additional dairy farming of cows <u>or intensive cattle or deer grazing and additional intensive winter grazing.</u>
259.3	F D Enterprises Ltd	Policy 11	Oppose in part	Remove the wording strongly discourage the granting of resource consent.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
264.3	FarmRight Ltd	Policy 11	Amend	Remove the wording “strongly discourage” the granting of resource consent.
265.42	Federated Farmers of NZ (Southland Province)	Policy 11	Oppose in part	Delete.
266.1	Fenham Downs Ltd	Policy 11	Oppose	If this law is made, what compensation are we going to get paid for being told what we can and can’t do with our land?
277.19	Fonterra Co-operative Group Ltd	Policy 11	Oppose in part	Amend policies 9 and 11 to remove the focus on “strongly discouraging the granting of resource consents for additional dairy farming” and instead focus on the effects of additional dairy farming that would not be considered acceptable. This might include reframing the policy so that it gives a clear direction that additional dairy farming will not be allowed where the systems and practices used allow for adverse effects to occur.
279.20	Forest & Bird NZ	Policy 11		Retain with amendment to prohibit dairy farming, intensive winter grazing and cultivation.
288.17	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 11	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.8	Glendhu Dairies Ltd	Policy 11	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
369.8	HENDERSON Michael	Policy 11	Amend	The wording ‘strongly discouraging’ should be removed. Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.11	Invercargill City Council	Policy 11		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
464.5	Landpro Ltd	Policy 11	Oppose in part	Amend the policy to remove point three: <u>strongly discourage the granting of consents.</u>
478.13	LOVERIDGE David	Policy 11	Support Amend	There is a need to be able to ensure new science will be added in the future.
483.11	Ludell Ltd	Policy 11	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				to Southland defining these areas.
484.2	M A Beer & Sons	Policy 11	Oppose	Absolutely oppose the idea of fencing off all waterways on our peat wetlands property to graze a few cattle. Remove this requirement in the Peat Wetlands for cattle grazing.
536.8	McKelvie Ltd	Policy 11	Amend	Amend to improve accuracy.
547.9	MCMULLEN G F	Policy 11	Amend	Be able to change incorrect zones etc. by consultant etc.
549.2	MCNAMARA Bevan	Policy 11	Amend	Replace wetland peat zone with a more appropriate name due to knee jerk reaction associated with the name.
555.9	MCRAE Daryl & Ruth	Policy 11	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
566.1	Mikkelsen Farms	Policy 11		Farms with small areas of peat should not have restrictions placed on them.
583.13	MOSEBY Ryan	Policy 11	Support	Retain.
590.3	Mt Linton Station	Policy 11	Oppose	For Old Mataura, and Peat types, existing land use should be allowed but a gradual phasing or change of practice favoured. Farm Plans should be used as an approach to make sure good management practices is implemented and risk identified and mitigation put in place in a reasonable and practical timeframe that fits farming budgets.
640.16	Pourakino Catchment Group	Policy 11	Support	Retain section 1.
661.19	Ravensdown Ltd	Policy 11	Support in part Amend	<p>Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:</p> <p>Policy 4 – Alpine</p> <p>In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>more than minor.</p> <p>Policy 5 – Old Matura and Peat Wetlands In the Old Matura and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6</p> <p>In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> <li>• Implementing Industry Agreed Good Management Practices.</li> </ul>
706.8	Sandy Creek Trust	Policy 11	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.19	Seaview Trust & Oraka Farms Ltd	Policy 11	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.8	Shallow Croft Ltd	Policy 11	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
733.10	SMITH Hamish & Karen	Policy 11		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.10	Smithill Ltd	Policy 11	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.40	Southland Conservation Board	Policy 11	Support	Retain.
752.55	Southland Fish & Game Council	Policy 11	Oppose	<p>Retain Policy 11 – Peat Wetlands as notified with the following amendments to Policy 11(2) and (3):</p> <p><del>“2. Having particular regard to</del> <u>Strongly discourage the granting of resource consents that result in adverse effects of contaminants, including phosphorus and E.coli, transported via artificial drainage, deep drainage and lateral drainage when assessing consent applications and preparing</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				or considering management plans;  3. <del>Prohibit strongly discouraging</del> the granting of resource consents for <u>new, or further intensification of existing dairy farming of cows additional dairy farming of cows and additional intensive winter grazing.</u> "
771.8	STEWART Family Trust (Trevor Stewart)	Policy 11	Amend	Make the farm plan as simple as possible for me to complete.
771a.8	STEWART Grahame (Filwood Farm)	Policy 11	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.18	Nga Runanga and TRONT	Policy 11		Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.
803.20	The Fertiliser Association of NZ	Policy 11	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u> <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> </ul> <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u>
810.16	Three Rivers Catchment Group (TRCG)	Policy 11	Support	Retain section 1.
811.8	THYS Herman & STAUT Tinneke	Policy 11	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.
820.4	TOPHAM Jeanette	Policy 11	Oppose	Remove point 3 from Policy 11. Allow time, give all zones five years for the changes made due to Farm Environment Plans and Management Plans to affect water quality and then re-evaluate.
832.27	VAN GOOL Raewyn	Policy 11	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
840.5	W & B Clarke & Son Ltd	Policy 11		Considering the relatively small areas of both the Peat Wetlands and The Old Mataura Physiographic zones (less than 3% of the total land), the relatively small rate of change regulations in these areas will have on improving water quality in Southland and the fact that these areas are generally concentrated and regulations have the potential to make farming

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>operations within these zones unviable, we believe there needs to be a mechanism for farm by farm assessment where the true cost of the proposed regulations to that farming operation are considered and individual plans developed in consultation with Environment Southland, not a one shoe fits all regulatory approach with the potential to ruin livelihoods.</p> <p>At the very least the implementation timeframes for both these zones needs to be reviewed so farmers can have time to make plans and implement changes over time allowing them to move forward gradually and lessening the immediate financial impact ultimately allowing them to make change whilst still having a financially viable business. We suggest an implementation of regulations to these zones by 2025.</p>
861.13	WHITE John Copeland	Policy 11	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated. We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.17	WILSON Aaron	Policy 11	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.22	WILSON Shannon	Policy 11	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

## Policy 12 – Riverine

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.11	ADAMS A J & P G	Policy 12	Amend	Provide accurate maps for each farm, take into account varying management and stock types

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				and have an effects based plan, not risk based.
17.16	Alliance Group Ltd	Policy 12	Oppose in part	Make amendments to these policies to ensure it is clear what activities they are to be applied to and make better linkages to Appendix N, relating to the preparation of farm management plans being the key method to achieve 'good management practices'.
24.30	Aratiatia Livestock Ltd	Policy 12	Support	Retain.
48.19	Ballance Agri-Nutrients	Policy 12	Oppose in part	Amend the Physiographic Zone Policies (4-12) in order that the provisions are simplified and clearer and easier to understand. Delete and replace clause (1) as follows: “ <u>requiring implementation of good management practices.</u> ” Delete Clause 3 of Policies 4, 9 and 11 as Clause 3 is redundant if clauses 1 and 2 are being achieved. Amend the words ‘strongly discouraging the granting of resource consents...’ and replace with a more appropriate approach such as applying an applicable activity classification and ensure that the framework or objectives and policies clearly presents what environmental effects / changes are acceptable and what are not. No activity should be precluded or discouraged if it can be undertaken in a manner that will not cause unacceptable environmental change or adverse effects.
64.9	BELGARD Family Trust (GA & JM Rauber)	Policy 12	Oppose Amend	Each farming practice should be looked at on it's own merits, not only which zone it may or may not belong to. ES complete validation and testing before making this law. Each consent should be judged individually. The new zone system will unfairly affect property values, which may not be truly reflected in there potential use.
73.9	BLACK Family Trust	Policy 12	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
80.10	BLAKELY Barney & Stephanie	Policy 12	Support	Retain.
81.12	BLAKELY Hamish & Hannah	Policy 12	Oppose	Until they can be peer reviewed under the Southland Science programme 3.2.1 Physiographic zones should be removed from the plan.
89.11	BRENTLEIGH Family Trust	Policy 12	Oppose	Until they can be peer reviewed under the Southland Science program 3.2.1 physiographic zones should be removed from the plan.
108.30	BYTHELL Jesse	Policy 12	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
172.6	COWAN Les & Christine	Policy 12	Oppose	Define the word 'relevant' in these policies.
189.12	Dairy Holdings Ltd	Policy 12	Support	Retain policy 12 as notified - that the approach be simplified where possible to remove unnecessary duplication (or very similar) in zones.
210.51	Director-General of Conservation	Policy 12	Support in part	Amend Policy 12 – Riverine to read: In the Riverine physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by: 1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via deep drainage, and overland flow where relevant; 2. having particular regard to adverse effects on water quality from contaminants <u>except for nitrates</u> transported via deep drainage, and overland flow where relevant when assessing resource consent applications and preparing or considering management plans. <u>3. Strongly discourage the granting of resource consents which increase the loss of nitrates to groundwater</u>
265.43	Federated Farmers of NZ (Southland Province)	Policy 12	Oppose in part	Delete.
288.18	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 12	Support in part	Rationalise the Physiographic Zone Policies to avoid duplication. It may be possible to provide some more general policy direction with specific policies highlighting the management approach specific to a certain zone.
319.9	Glendhu Dairies Ltd	Policy 12	Oppose	Delete Physiographic Zones until this can be reviewed and assessed as an appropriate zoning method. Physiographic zones need to be assessed on an individual farm basis and farmers should be able to challenge this mapping if appropriate evidence can be provided that they are incorrect.
322.5	Glenlapa Station	Policy 12	Support	Continue working with our Land Sustainability Officer (LSO).
358.9	HASTIE Stephen	Policy 12	Oppose	True and correct mapping needs to be carried out.
369.9	HENDERSON Michael	Policy 12	Oppose	Need up to date maps with independent peer review processes. These zones should be removed until this has happened.
411.12	Invercargill City Council	Policy 12		That discharge limits are open for public submission and are backed by scientific and industry evidence as practicable and economically viable.
478.14	LOVERIDGE David	Policy 12	Support	There is a need to be able to ensure new science will be added in the future.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	
481.4	Lowburn Dairy Farms	Policy 12	Amend	All applications and consents processed only by regional council, iwi not to have input on individual applications and consents.
483.12	Ludell Ltd	Policy 12	Oppose	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland defining these areas.
536.9	McKelvie Ltd	Policy 12	Amend	Amend to improve accuracy.
547.10	MCMULLEN G F	Policy 12	Amend	Be able to change incorrect zones etc. by consultant etc.
555.10	MCRAE Daryl & Ruth	Policy 12	Support in part	We like the science behind the use of the Physiographic Zones, but would like it if Environment Southland provides farm scale physiographic plans that can be checked. Include effects based parameters in the plan that allows for varying management approaches, stock types and stocking rates.
583.14	MOSEBY Ryan	Policy 12	Support	Retain.
640.17	Pourakino Catchment Group	Policy 12	Support	Retain section 1.
661.20	Ravensdown Ltd	Policy 12	Support in part Amend	Ravensdown seeks for the overall intent and approaches included in Policies 4-12 to be retained. Furthermore, Ravensdown seeks Policies 4 – 12 to be deleted and replaced with the following policies (or similar), with subsequent policies re- numbered:  Policy 4 – Alpine In the Alpine physiographic zone, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants via overland flow, and</li> <li>• Implementing Industry Agreed Good Management Practices, and</li> <li>• Prohibiting new dairy farming and new intensive winter grazing, and</li> <li>• Not granting resource consents for cultivation, except where the adverse effects are no more than minor.</li> </ul> Policy 5 – Old Maitava and Peat Wetlands In the Old Maitava and Peat Wetlands physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by: <ul style="list-style-type: none"> <li>• Controlling land use activities and,</li> <li>• Managing the transport of contaminants, and</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>Implementing Industry Agreed Good Management Practices, and</li> <li>Restricting new dairy farming and new intensive winter grazing, except where the adverse effects are no more than minor</li> </ul> <p>Policy 6</p> <p>In all other Physiographic zones, avoid, remedy or mitigate adverse effects on water quality, by:</p> <ul style="list-style-type: none"> <li>Controlling land use activities and,</li> <li>Managing the transport of contaminants, and</li> </ul> <p>Implementing Industry Agreed Good Management Practices.</p>
666.7	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 12	Support Oppose	Explanations on how physiographic zones are allocated need more community engagement. Farmers need a procedure to challenge Zones for their land.
706.9	Sandy Creek Trust	Policy 12	Oppose	To me the solution would be that I draw a map up of my property outlining certain areas I know are peat wetlands as I know my property better.
712.20	Seaview Trust & Oraka Farms Ltd	Policy 12	Oppose	Remove from the plan and place alongside the GMPs outside the plan.
718.9	Shallow Croft Ltd	Policy 12	Oppose Amend	Add a rule/clause into the Plan so land owners can seek a re-classification of incorrect Physiographic Zones at the expense of Environment Southland.
733.11	SMITH Hamish & Karen	Policy 12		Amend to allow a provision for a landowner to seek reclassification of their farm's physiographic zone by an independent source should the original zoning be in doubt.
737.11	Smithill Ltd	Policy 12	Support in part Amend	We Support in part this policy, but there must be a more consultative approach to zoning and landholders must be able to challenge the physiographic zoning allocated.
749.41	Southland Conservation Board	Policy 12	Support	Retain.
752.56	Southland Fish & Game Council	Policy 12	Support Amend	Retain Policy 12 – Riverine as notified with the following amendment to Policy 12(2) and the following addition: <del>“2. Having particular regard to</del> <u>Strongly discourage the granting of resource consents that result in adverse effects of contaminants, including nitrates, transported via deep drainage and overland flow where relevant when assessing consent applications and preparing or considering management plans;</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>3. Strongly discouraging the granting of resource consents for new, or further intensification of existing dairy farming of cows and additional intensive winter grazing.”</u>
771.9	STEWART Family Trust (Trevor Stewart)	Policy 12	Amend	Make the farm plan as simple as possible for me to complete.
771a.9	STEWART Grahame (Filwood Farm)	Policy 12	Amend	I propose a rule be added into the plan so landowners can apply to have incorrect physiographic zones reclassified.
797.19	Nga Runanga and TRONT	Policy 12	Support in part	Amend the policies to include controls for risks specific to these zones from all discharges, water take and use and land use including soil health.  Amend Policy 12 to read:  In the Riverine physiographic zone, avoid, remedy, or mitigate adverse effects on water quality from contaminants, by:  1. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via deep drainage, and overland flow <del>where relevant</del> <u>where relevant</u> ;  2. having particular regard to adverse effects on water quality from contaminants transported via deep drainage, and overland flow <del>where relevant</del> when assessing resource consent applications and preparing or considering management plans.  3. <u>Discouraging the granting of resource consents for new or additional dairy farming of cows and additional winter grazing.</u>
803.21	The Fertiliser Association of NZ	Policy 12	Oppose Amend	Delete Policies 4 to 12 and replace with the following: <u>In all the physiographic zones, avoid, remedy, or mitigate adverse effects of any land use activities on water quality, by:</u>  <ul style="list-style-type: none"> <li>• <u>managing the transport of contaminants, and</u></li> <li>• <u>implementing Good Management practices, and</u></li> <li>• <u>addressing the specific environmental risk to water quality identified for each physiographic area.</u></li> </ul>
810.17	Three Rivers Catchment Group (TRCG)	Policy 12	Support	Retain section 1.
811.9	THYS Herman & STAUT Tinneke	Policy 12	General support	Clarify how disputes about the physiographic zones on farm and even further on paddock level would be managed.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
832.28	VAN GOOL Raewyn	Policy 12	Amend	Amend to include a clear process/mechanism where landholders can challenge the physiographic zone(s) allocated to their land.
861.14	WHITE John Copeland	Policy 12	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.  We suggest that the physiographic zones are best sitting outside of the plan (like GMP's) to avoid costly plan change process where there are future science updates or changes to zones that people fall in to.
877.18	WILSON Aaron	Policy 12	Oppose in part	A method to dispute or re-classify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line."
880.23	WILSON Shannon	Policy 12	Oppose in part	A method to dispute or reclassify PZ portions/farms needs to be developed. PZs policies should come into effect during the limit setting process, if required at all. PZ policies should not disproportionately disadvantage farmers between zones. A detailed economic impact study on each PZ needs to be completed prior to any policies taking effect. PZs are a risk management tool and should only be applied in that context, effect based solutions are what are required to "hold the line." The W&L plan needs to include these amendments.

#### Policy A4 of the NPS for Freshwater Management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.31	Aratiatia Livestock Ltd	Policy A4	Support	Retain.
277.20	Fonterra Co-operative Group Ltd	Policy A4	Oppose	Delete.
288.19	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy A4	Support in part	Include a reference to the NPS Freshwater in the Statutory Framework Section of the plan.
381.6	HOLDER Wendy & Tom	Policy A4		(b) should read the extent to which it is feasible and dependable that any adverse effect on the health of people and communities as affected by their secondary contact with fresh water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				resulting from discharge would be avoided.
381.7	HOLDER Wendy & Tom	Policy A4		No 3 Should be changed to all discharge. Nos 4 & 5 should be deleted.
664.13	Real Journeys Ltd	Policy A4		It should be made clearer that this policy is lifted straight out of National Policy Statement for Freshwater Management 2014.
877.19	WILSON Aaron	Policy A4	Support	It should not target dairy farming activities exclusively.
880.24	WILSON Shannon	Policy A4	Support	The W & L plan needs to further recognise the part the whole community has to play in maintaining and improving water quality. It should not target dairy farming activities exclusively.

### Policy 13 – Management of land use activities and discharges

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.17	Alliance Group Ltd	Policy 13	Oppose	Delete.
24.32	Aratiatia Livestock Ltd	Policy 13	Support	Retain.
25.7	Ardel Dairies Ltd	Policy 13	Support	Retain.
48.20	Ballance Agri-Nutrients	Policy 13	Support	Retain.
52.1	Bathurst Resources Ltd	Policy 13		Rewrite Policy 13 to read: “Manage land use activities and discharges (point source and non-point source) to land and water so that <u>any adverse effects that are more than minor are avoided, remedied or mitigated with respect to</u> water quality and the health of humans, domestic animals and aquatic life, <del>is</del> <u>protected.</u> ”
89.12	BRENTLEIGH Family Trust	Policy 13	Support	Retain.
92.1	Bristol Grove Dairies	Policy 13(v)	Amend	Amend because the depth of drains can move underground as the soil dries out, only where the drain enters an open waterway should be mapped.
108.31	BYTHELL Jesse	Policy 13	Support	Retain.
205.7	Dillon Ag Ltd (Chris Dillon)	Policy 13	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
206.7	Dillon Ag Ltd (Rochelle Dillon)	Policy 13	Support	Retain.
209.13	DIPROSE Dave	Policy 13	Oppose	Manage <del>land use</del> activities and discharges (point source and non-point source) to land and water so that water quality and the health of humans, domestic animals and aquatic life, is protected.
210.52	Director-General of Conservation	Policy 13	Support	Retain.
265.44	Federated Farmers of NZ (Southland Province)	Policy 13	Oppose in part	Ensure that the Plan recognises that water and land must be used to provide for the economic and social wellbeing of the community and amend Policy 13 as follows:  <del>Manage</del> <u>Enable</u> land use activities and discharges (point source and non-point source) to land and water <u>to enable the community to provide for its economic, social, and cultural wellbeing, while maintaining or improving water quality.</u> <del>so that water quality and the health of humans, domestic animals and aquatic life, is protected.</del>
277.21	Fonterra Co-operative Group Ltd	Policy 13	Oppose in part	Amend Policy 13 as follows: <u>Policy 13 – Management of land use activities and discharges</u> Manage land use activities and discharges (point source and non-point source) to land and water so that water quality <u>is either maintained or improved to safeguard</u> <del>and</del> the health of humans, domestic animals and aquatic life, <del>is protected.</del>
279.21	Forest & Bird NZ	Policy 13	Support with minor amendment	Amend to provide clearer direction to decision makers.
299.9	GARDYNE John	Policy 13	Oppose	Protected a bit strong.
330.3	Gore District Council, Invercargill City Council and Southland District Council	Policy 13	Support	Retain.
342.4	H W Richardson Group	Policy 13	Oppose	Amend as follows:  Manage land use activities and discharges (point source and non-point source) to land and water <u>so that water quality to avoid, remedy or mitigate adverse effects on</u> <del>and</del> the health of

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				humans, domestic animals and aquatic life, <del>is protected.</del>
449.7	KiwiRail Holdings Ltd (KiwiRail)	Policy 13	Support	Retain.
570.6	MILLER R L & S J Farm Trust	Policy 13	Support in part	Amend Policy 13 to read: <del>Enable manage</del> land use activities <del>&amp; discharges activities</del> and discharges (point source & non-point source) to land & water so that water quality <u>is maintained or improved, to provide for the economic, social &amp; cultural well-being of the community and the health of humans,</u> <del>domestic animals and aquatic life is protected.</del>
661.21	Ravensdown Ltd	Policy 13	Support in part Oppose in part	Ravensdown seeks for the intent of Policy 13 to be retained as written, with the following amendment: “Manage land use activities and discharges (point source and non-point source) to land and water so that water quality <u>is maintained, or improved where degraded,</u> and the health of humans, <del>domestic</del> animals and aquatic life is protected.”
749.42	Southland Conservation Board	Policy 13	Amend	Re-word the policy to read: Manage land use activities and discharges...to land and water so that water quality, <u>significant indigenous biodiversity</u> and the health of humans, domestic animals and aquatic life are protected.
752.57	Southland Fish & Game Council	Policy 13	Support	Retain.
797.20	Nga Runanga and TRONT	Policy 13	Support	Retain.
802.7	The 254 Partnership & Gerken Family Trust	Policy 13	Support	Retain.
803.22	The Fertiliser Association of NZ	Policy 13	Support in part Amend	Amend Policy 13 as follows: Manage land use activities and discharges (point source and non-point source) to land and water so that water quality <u>is maintained or improved where degraded to the point of being over-allocated,</u> and the health of humans, <del>domestic</del> animals and aquatic life, <del>is protected</del> <u>are provided for.</u>
832.29	VAN GOOL Raewyn	Policy 13	Support	Retain.
895.25	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil	Policy 13	Amend	Amend Policy 13 to focus on the function of the regional council and to remove blanket protection of all water quality. This could be achieved by amending policy 13 as set out in

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Companies)			<p>either of the options below, noting that alternative relief may achieve similar outcomes.</p> <p><b>Policy 13 – Management of regional land use activities and discharges</b>  Manage regional land use activities and discharges (point source and non-point source) to land and water so that <u>adverse effects on water quality are avoided, remedied or mitigated</u> <del>water quality</del> and the health of humans, domestic animals and aquatic life, is protected.</p> <p><b>Policy 13 – Management of regional land use activities and discharges</b>  Manage regional land use activities and discharges (point source and non-point source) to land and water so that water quality <u>remains protective of</u> <del>and</del> the health of humans, domestic animals and aquatic life, <del>is protected</del>.</p>

#### Policy 14 – Preference for discharges to land

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.18	Alliance Group Ltd	Policy 14	Oppose in part	Amend Policy 14 as follows: Prefer discharges to land, rather than direct discharges to water <u>where practicable and appropriate</u> .
24.33	Aratiatia Livestock Ltd	Policy 14	Support	Retain.
25.8	Ardel Dairies Ltd	Policy 14	Support	Retain.
48.21	Ballance Agri-Nutrients	Policy 14	Support in part	<p>Amend to read:</p> <p><b>Policy 14 – Preference for discharges to land</b>  Prefer discharges <u>of contaminants</u> to land, <del>rather than direct</del> <u>over discharges of contaminants</u> to water, <u>where:-</u></p> <p>(a) <u>a discharge to land is practicable;</u></p> <p>(b) <u>the adverse effects associated with a discharge to land are less than a discharge to water.</u></p>
52.2	Bathurst Resources Ltd	Policy 14		Delete.
89.13	BRENTLEIGH Family Trust	Policy 14	Support	Retain.
108.32	BYTHELL Jesse	Policy 14	Support	Retain.
205.8	Dillon Ag Ltd	Policy 14	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Chris Dillon)			
206.8	Dillon Ag Ltd (Rochelle Dillon)	Policy 14	Support	Retain.
265.45	Federated Farmers of NZ (Southland Province)	Policy 14	Oppose in part	Amend Policy in line with the RPS as follows:  Prefer discharges <u>of contaminants</u> to land <u>over</u> discharges of contaminants to water, where: <u>(a) a discharge to land is practicable;</u> <u>(b) the adverse effects associated with a discharge to land are less than a rather than direct discharge to water.</u>
275.1	FLETT Alan	Policy 14	Amend	An abatement notice to Councils to stop this and a system installed to apply effluent to land.
277.22	Fonterra Co-operative Group Ltd	Policy 14	Support in part	Amend Policy 14 so as to read: “Policy 14 – Preference for discharges to land Prefer discharges to land, rather than direct discharges to water, <u>where appropriate.</u> ”
279.22	Forest & Bird NZ	Policy 14	Support	Retain
330.4	Gore District Council, Invercargill City Council and Southland District Council	Policy 14	Oppose Amend	Policy 14 is amended as follows: <b>Policy 14 – Preference for discharges to land</b> Prefer discharges to land, rather than direct discharges to water <u>where practicable.</u>
411.13	Invercargill City Council	Policy 14	Support in part	That Policy 14 is reworded to include the words “where practicable” at the end of the policy.
562.4	Meridian Energy Ltd	Policy 14	Oppose in part	Amend Policy 14 to read: (a) Prefer discharges <u>of contaminants</u> to land, rather than direct discharges to water.
661.22	Ravensdown Ltd	Policy 14	Support in part	Ravensdown seeks for the intent of Policy 14 to be retained, while amending it to read: “ <u>When considering applications for point-source discharges, P-preference will be given to discharges to land, rather than direct discharges to water.</u> ”
731.2	SMITH Barry	Policy 14		Use the plan to change the mindset of farms, council staff and members of the public into the thinking that effluent has a high intrinsic value to anyone using it.
749.43	Southland Conservation Board	Policy 14	Support	Retain.
750.3	Southland District Council	Policy 14	Amend	Amend as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				“Prefer discharges to land, rather than direct discharges to water <u>where practicable.</u> ”
752.58	Southland Fish & Game Council	Policy 14	Support	Retain.
797.21	Nga Runanga and TRONT	Policy 14	Support	Retain.
802.8	The 254 Partnership & Gerken Family Trust	Policy 14	Support	Retain.
803.23	The Fertiliser Association of NZ	Policy 14	Support in part Amend	Amend Policy 14 as follows: <u>When considering applications for discharges, P</u> reference <u>will be given to</u> discharges to land, rather than direct discharges to water- <u>where:-</u> (c) <u>a discharge to land is practicable;</u> (d) <u>the adverse effects associated with a discharge to land are less than a discharge to water.</u>
832.30	VAN GOOL Raewyn	Policy 14	Support	Retain.
880.25	WILSON Shannon	Policy 14	Support	The W&L plan needs to further recognise the part the whole community has to play in maintaining and improving water quality. It should not target dairy farming activities exclusively.
895.26	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 14	Support	Retain.
210.53	Director-General of Conservation	Policy 14	Support	Retain.

### Policy 15 – Maintaining and improving water quality

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.19	Alliance Group Ltd	Policy 15	Oppose	Amend Policy 15 as follows: <del>Maintain and improve</del> <u>Until such time as the freshwater objectives and freshwater management unit limits are established in accordance with Policy 47 manage land use activities and discharges in order to water quality by:</u> 1. <del>despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing;</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</del></p> <p><del>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</del></p> <p><del>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified water course beyond the zone of reasonable mixing;</del></p> <p><del>so that:</del></p> <ol style="list-style-type: none"> <li><del>1. water quality is maintained water quality in surface water bodies – where it is better than the water quality standards specified in Appendix E “Water Quality Standards”; or</del></li> <li><del>2. water quality is where practicable improved water quality in surface water bodies where it does not meet the water quality standards specified in Appendix E “Water Quality Standards” unless there are natural exceedances of such standards in the water body; and</del></li> <li><del>3. water quality meets the Drinking Water Standards for New Zealand 2005(revised); and</del></li> <li><del>4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.</del></li> </ol>
24.34	Aratiatia Livestock Ltd	Policy 15	Support	Retain.
48.22	Ballance Agri-Nutrients	Policy 15	Support in part	<p>Amend to read:</p> <p><b>Policy 15 – Maintaining and improving water quality</b></p> <p>Maintain <del>or</del> <del>and</del> improve <u>overall</u> water quality by:</p> <ol style="list-style-type: none"> <li>1. despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing;</li> <li>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</li> <li>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</li> <li>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing;</li> </ol> <p>so that:</p> <ol style="list-style-type: none"> <li>1. water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards”; or</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<del>2. water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and—</del> <del>3. water quality meets the Drinking Water Standards for New Zealand 2005 (revised 2008); and—</del> 4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.—
52.3	Bathurst Resources Ltd	Policy 15		Reword Policy 15 so that discharges to water or to land, as well as relevant land activities will be permitted provided that any adverse effects, that are more than minor, on the receiving water quality are avoided, remedied or mitigated.
108.33	BYTHELL Jesse	Policy 15	Support	Retain.
190.10	DairyNZ	Policy 15		Please see our comments in relation to Appendix E of the Plan below.
210.54	Director-General of Conservation	Policy 15	Support	Retain.
249.9	Ernslaw One Ltd	Policy 15	Support	Maintain reliance on “Reasonable Mixing” except for Rule 15 (tile pipe drainage), where because of the cumulative effects needs to be addressed as source.
249.10	Ernslaw One Ltd	Policy 15	Amend	Add a new subsection (5) to the effect: Where water quality is at, or below, agreed community objectives (or Attribute States as per the NPS-Freshwater), amend the policy to set timelines for Council to: (5) Call in existing discharge consents and reduce the permitted loadings, and add a polluter pays fee, appropriate to the scale and significance of the consented discharge. (6) place an appropriate ‘sinking lid’ on total cow numbers in each of Southland’s physiographic zones (unless housed in herd homes with bio-digesters, and a cut-and-carry feed regime). (7) require a resource consent (restricted discretionary ) to apply urea or other nitrogenous fertilisers.
265.46	Federated Farmers of NZ (Southland Province)	Policy 15	Oppose in part	Oppose in part, submitter seeks amendments to Appendix E in line with the National Objectives Framework – see original submission for detail.
277.23	Fonterra Co-operative Group Ltd	Policy 15	Oppose in part	Amend Policy 15 so as to read: <u>Policy 15 – Maintaining and improving water quality</u> Maintain <del>and</del> <u>or</u> improve water quality by:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>1. despite any other policy <del>or objective</del> in this Plan, avoiding new discharges to surface waterbodies that reduce water quality beyond the zone of reasonable mixing;</p> <p>2. <del>avoiding</del> managing point source and non-point source discharges to land <del>that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</del></p> <p>3 <del>avoiding</del> managing land use activities <del>that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated;</del> and</p> <p>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing;</p> <p><u>to the extent necessary to ensure so that:</u></p> <p>1. water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards”; or</p> <p>2. water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and</p> <p>3. <u>groundwater</u> quality meets the Drinking-Water Standards for New Zealand 2005 (revised 2008) <u>where it is used for that purpose;</u> and</p> <p>4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.</p>
279.23	Forest & Bird NZ	Policy 15	Support with minor amendment	<p>Retain Policy 15(1) and 15(4) as notified.</p> <p>Amend Policy 15(2) as follows:</p> <p>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, <del>unless the adverse effects of the discharge can be avoided, remedied or mitigated;</del></p> <p>Amend Policy 15(3) as follows:</p> <p>3. avoiding land use activities that will reduce surface or groundwater quality, <del>unless the adverse effects can be avoided, remedied or mitigated;</del> and</p>
330.5	Gore District Council, Invercargill City Council and Southland District Council	Policy 15	Oppose Amend	<p>Policy 15 is amended as follows:</p> <p><b>Policy 15 – Maintaining and improving water quality</b></p> <p>Maintain and improve water quality by:</p> <p>1. despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing <u>unless the adverse effects of the discharge can be avoided, remedied or mitigated;</u></p> <p>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided,</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>remedied or mitigated;</p> <p>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</p> <p>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or <del>modified</del> <u>modified</u> watercourse beyond the zone of reasonable mixing;</p> <p>so that:</p> <p>1. water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards”; or</p> <p>2. water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and</p> <p><del>3. water quality meets the Drinking Water Standards for New Zealand 2005 (revised 2008); and</del></p> <p>ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.</p>
355.2	HARRIS David	Policy 15	Amend	Amend to clarify the intention of the policy.
381.8	HOLDER Wendy & Tom	Policy 15		Remove “new” from (i) and insert “all”.
390.11	Horticulture NZ	Policy 15	Support in part Oppose in part	Amend Policy 15 (4) by adding, <u>‘unless the adverse effects can be avoided, remedied or mitigated.’</u>
390.12	Horticulture NZ	Policy 15	Support in part Oppose in part	Delete Clauses 3 and 4 requiring compliance with: - Drinking Water Standards for NZ 2005 (Revised 2008) - ANZECC Sediment Guidelines (App C)
411.14	Invercargill City Council	Policy 15	Support in part	Include the words “beyond the reasonable mixing zone” into Clauses 2 and 3.
562.5	Meridian Energy Ltd	Policy 15	Oppose in part	Policy 15 – Maintaining and improving water quality Maintain and improve water quality by: 1. despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing; 2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>mitigated;</p> <ol style="list-style-type: none"> <li>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</li> <li>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing;</li> </ol> <p>so that:</p> <ol style="list-style-type: none"> <li>1. water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards” <u>while recognising that existing freshwater quality in the lakes and rivers is influenced by naturally occurring processes and variation</u>; or</li> <li>2. water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and</li> <li>3. water quality meets the Drinking-Water Standards for New Zealand 2005 (revised 2008);and</li> <li>4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.</li> </ol>
614.3	NZ Transport Agency	Policy 15	Oppose Amend	<p>Policy 15 – Maintaining and improving water quality Maintain and improve water quality by:</p> <ol style="list-style-type: none"> <li>1. <del>despite any other policy or objective in this Plan, avoiding, remedy or mitigate the effects of</del> new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing;</li> <li>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</li> <li>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</li> <li>4. <del>avoiding, remedy or mitigate</del> discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing;</li> </ol>
622.9	P F Olsen Ltd	Policy 15	Support Amend	<p>Maintain reliance on “Reasonable Mixing” Except for Rule 15 (tile pipe drainage). But exclude temporary effects from plantation harvesting or redefine spatial or temporal bounds that apply.</p> <p>Add a new subsection (5) to the effect: Where water quality is at or below community agreed objectives (or Attribute States as per the NPS-Freshwater), set timelines for Council to (5) Call in existing discharge consents and reduce the permitted loadings by applying reallocative mechanisms in tune with the already suggested principles of market transfer mechanisms operating within a ‘Natural Capital’ framework</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(6) place a sinking lid on total cow numbers in each of Southlands physiographic zones (7) require a resource consent (restricted discretionary) to apply urea or other nitrogenous fertilisers.
661.23	Ravensdown Ltd	Policy 15	Oppose in part	Ravensdown seeks for Policy 15 to be amended to read: “Maintain <del>and or</del> improve water quality by: ... 4. <del>avoiding-controlling</del> discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing; so that: ... 3. water quality meets the Drinking-Water Standards for New Zealand 2005 (revised 2008) <u>in surface water bodies where water is taken for municipal or domestic water supply purposes</u> ; and 4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met <u>or if not met investigated to assess potential for risk.</u> ”
749.44	Southland Conservation Board	Policy 15	Support Amend	Retain Policy as notified and amend Policy 15(4) to provide: “4. Avoiding discharges to artificial watercourses that will reduce water quality in a river, lake, <u>natural wetland, lagoon</u> or modified watercourse beyond the zone of reasonable mixing.”
750.4	Southland District Council	Policy 15	Amend	Amend the wording of the policy as follows:  “Maintain and improve water quality by:  1. Despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing <u>unless the adverse effects of the discharge can be avoided, remedied or mitigated</u> ; 2. Avoiding point source and non-point source discharges to land that will reduce surface or groundwater, unless the adverse effects of the discharge can be avoided, remedied or mitigated; 3. Avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and 4. Avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing; So that:  1. Water quality is maintained where it is better than the water quality standards specified



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>in Appendix E “Water Quality Standards”; or</p> <ol style="list-style-type: none"> <li>2. Water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and</li> <li>3. Water quality meets the Drinking Water Standards for New Zealand 2005 (revised 2008) <u>at the point of nearest abstraction</u>; and</li> <li>4. ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.”</li> </ol>
752.59	Southland Fish & Game Council	Policy 15	Support	Retain.
797.22	Nga Runanga and TRONT	Policy 15	Support	Retain.
803.24	The Fertiliser Association of NZ	Policy 15	Support in part Amend	<p>Amend Policy 15 as follows:</p> <p>Maintain <del>and</del> <u>or</u> improve water quality by:</p> <ol style="list-style-type: none"> <li>1. despite any other policy or objective in this Plan, avoiding new discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing;</li> <li>2. avoiding point source and non-point source discharges to land that will reduce surface or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</li> <li>3. avoiding land use activities that will reduce surface or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</li> <li>4. <del>avoiding control</del> discharges to artificial watercourses that will reduce water quality in a river, lake or <del>modified</del> <u>modified</u> watercourse beyond the zone of reasonable mixing;</li> </ol> <p>so that:</p> <ol style="list-style-type: none"> <li>1. water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards”; or</li> <li>2. water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards”; and</li> <li>3. <del>water quality meets the Drinking Water Standards for New Zealand 2005 (revised 2008);</del> and</li> <li>4. ANZECC sediment <del>guidelines</del> <u>trigger values</u> (as shown in Appendix C of this Plan) are <del>met</del> <u>not exceeded or if exceeded, investigated to assess potential for risk.</u></li> </ol>
832.31	VAN GOOL Raewyn	Policy 15	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
895.27	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 15	Amend	<p>Ensure Policy 15 is clear and workable, sets appropriate thresholds and standards for discharges, and allows for balanced consideration of objectives and policies across the plan. The following changes are proposed but alternative wording may achieve similar outcomes:</p> <p><u>Policy 15 – Maintaining and improving water quality</u></p> <p>Maintain and improve water quality <u>so that:</u> by:</p> <ol style="list-style-type: none"> <li><del>1. despite any other policy or objective in this Plan, avoiding new point source discharges to surface waterbodies that will reduce water quality beyond the zone of reasonable mixing;</del></li> <li><del>2. avoiding point source and non-point source discharges to land that will reduce surface water or groundwater quality, unless the adverse effects of the discharge can be avoided, remedied or mitigated;</del></li> <li><del>3. avoiding land use activities that will reduce surface water or groundwater quality, unless the adverse effects can be avoided, remedied or mitigated; and</del></li> <li><del>4. avoiding discharges to artificial watercourses that will reduce water quality in a river, lake or modified watercourse beyond the zone of reasonable mixing;</del></li> </ol> <p><del>so that:</del></p> <ol style="list-style-type: none"> <li>1. <u>surface water quality is maintained where it is better than the water quality standards specified in Appendix E “Water Quality Standards” and ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met;</u> <del>or</del></li> <li>2. <u>surface water quality is improved where it does not meet the water quality standards specified in Appendix E “Water Quality Standards” and ANZECC sediment guidelines (as shown in Appendix C of this Plan); and</u></li> <li>3. <u>groundwater quality is maintained where it is better than the water quality standards specified in-meets the Drinking-Water Standards for New Zealand 2005 (revised 2008); and</u></li> <li>4. <u>groundwater quality is improved where it does not meet the water quality standards specified in the Drinking-Water Standards for New Zealand 2005 (revised 2008)</u></li> </ol> <p>4. <u>ANZECC sediment guidelines (as shown in Appendix C of this Plan) are met.</u></p>

## Policy 16 – Farming activities that affect water quality

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.35	Aratiatia Livestock Ltd	Policy 16	Support	Retain but we are concerned that ES should acknowledge that the pace of change in what constitutes best on farm management practice is rapid and that modelling (through Overseer) of nutrient loss to water frequently lags innovation. With respect to 16(2)c we would ask ES to acknowledge the significant progress the dairy industry has made in fencing off waterways and critical source areas and implementing grazing setbacks.
25.9	Ardel Dairies Ltd	Policy 16	Oppose	Delete the wording “strongly discourage” and define “close proximity”. The independently audited self-management plan needs to be properly explained so that the structure and requirements of this process are clearly understood.
26.5	Ardoyne Farm Dairys	Policy 16		We should be able to put in 50 hectares with the maximum of 20 hectares on peat or old Mataura.
44.1	BAKER Wendy	Policy 16	Support	Retain.
47.4	Balfour, Wendonside & Waikaia Group	Policy 16	Oppose in part	Remove the wording ‘strongly discourage’ and provide a clearer indication of what ‘close proximity’ is.
48.23	Ballance Agri-Nutrients	Policy 16	Oppose in part	Amend Policy 16 to address submitters concern with the use of the words ‘strongly discouraging’ and consistency with the Act. See original submission for detail.
64.10	BELGARD Family Trust (GA & JM Rauber)	Policy 16	Amend	Dairying is being unfairly discriminated against. It is assuming that dairying will further degrade water quality.
80.11	BLAKELY Barney & Stephanie	Policy 16	Oppose	All bedrock/hill country farms to be removed from this policy. Delete requirement for FEP, however if farm management plan is to remain, this should be a document held by farmers, for their use to improve management. ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.
81.13	BLAKELY Hamish & Hannah	Policy 16	Oppose	All bedrock/hillcountry farms to be removed from this policy.
86.2	BOWMAR Ross	Policy 16	Amend	Either allow intensification or do not. The intensification should be determined by the maximum intensification in the region in question. If the maximum level needs reduced, then this should be phased in. Amend Policy 16(c) so that a management plan is optional. Amend Policy 16(2)(c) Identify to all farmers the implications for their properties and then recall for submissions on this plan. Only once farmers know the impacts on their business and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				livelihoods will they be best situated to respond. Accordingly, I feel Environment Southland needs to spend at least 4-5 years providing information about physiographic zones and properties of each. This should include visiting each property as this will identify if the plan is actually practicable without causing significant economic hardship.
92.2	Bristol Grove Dairies	Policy 16(1)		Why is dairy farming singled out when flower, vegetable and cropping have a much higher use of fertiliser and cause significant degradation of soil structure, but is not included in this Policy?
103.4	BYARS A R & L J Trust	Policy 16	Amend	Amend to define how close is 'close'. Delete the requirement of a farming management plan.
108.34	BYTHELL Jesse	Policy 16	Support	Retain.
156.4	COCKBURN Grant & Rachel	Policy 16	Amend	`Clarify what is an acceptable farming intensity/N loss limit for each PZ. Clarify what 'close proximity' means. Is this intended to mean within 1km, 10km or 20km of a sensitive water body?
166.2	COPELAND Pete & Tanya	Policy 16	Oppose in part	Delete section (b).
172.7	COWAN Les & Christine	Policy 16	Oppose	Replace with policy providing helpful advice not requiring paper work.
176.1	Crayburn Farm Trust	Policy 16	Amend	Policy 16(1) needs to be reviewed. The environment needs to be balanced with productivity.
189.13	Dairy Holdings Ltd	Policy 16		Amend Policy 16(1): Minimising the environmental effects (including on the quality of water in rivers, coastal lakes, tidal estuaries, salt marshes and coastal wetlands, <del>and groundwater</del> ) from farming activities by:  Amend Policy 16(1)(a): strongly discouraging the establishment of new dairy farming or intensive winter grazing activities in close proximity to sensitive waterbodies identified in Appendix Q; <u>where adverse effects on the sensitive waterbodies cannot be avoided, remedied or mitigated.</u>  Amend 16(1)(b): Strongly discouraging applications to establish new, or further intensify existing dairy farming of cows or intensive winter grazing activities where the effects on the quality of water, including cumulatively, of <del>groundwater</del> , <u>surface</u> waterbodies, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands cannot be avoided or fully mitigated or in areas where water quality is already degraded to the point of being over-allocated.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Amend 16(1)(a) to include clear set-back distances for dairy farming and intensive winter grazing activities from sensitive waterbodies.
190.11	DairyNZ	Policy 16	Support Amend	Amend to: a) strongly discouraging the establishment of new dairy farming or new intensive winter grazing activities <del>in close proximity to</del> <u>within 100 metres of</u> sensitive water bodies identified in Appendix Q; and Amend to clarify the term “fully mitigated”.
192.4	DALE P T & S B Trust	Policy 16 1 & 2	Amend	Minimizing environmental effects should come through the initiation of Farm Management Plans and associated steps individual farms take to undertake best practice on their farms. Also through ES Rules and procedures already in place. Management Plans should not be financially onerous. They should be practical and timely.
193.2	David McKee Farms Ltd	Policy 16(2)(a)	Oppose	Delete.
209.14	DIPROSE Dave	Policy 16	Oppose	(b) actively manage sediment run-off risk from farming and hill country development <del>by requiring setbacks from waterbodies, riparian planting, limits on areas or duration of exposed soils and</del> the prevention of stock entering surface waterbodies; (c) manage collected and diffuse run-off and leaching of nutrients, microbial contaminants and sediment through the identification and management of higher risk <del>physiographic</del> zones on a regional scale, and critical source areas within individual properties.
210.55	Director-General of Conservation	Policy 16(1)	Support in part	Amend Policy 16 (1) to read- 1. Minimising the environmental effects (including on the quality of water in rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater) from farming activities by: (a) strongly discouraging the establishment of new dairy farming or new intensive winter grazing activities <u>or other intensive farming activities</u> in close proximity to sensitive waterbodies identified in Appendix Q; (b) strongly discouraging applications to establish new, or further intensify existing dairy farming of cows or intensive winter grazing activities <u>or other intensive farming activities</u> where the effects on the quality of water, including cumulatively, of groundwater, waterbodies, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands cannot be avoided or fully mitigated or in areas where water quality is already degraded <u>or susceptible to degradation or degraded to</u> the point of being over-allocated.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Amend Policy 16 2 to read:</p> <p>2. Requiring all farming activities, including existing activities, to:</p> <p>(a) either implement a Management Plan, as set out in Appendix N, or be listed on the Environment Southland Register of Independently Audited Self-Management Participants;</p> <p>(b) actively manage sediment run-off risk from farming and hill country development <u>by protecting indigenous vegetation</u>, requiring setbacks from waterbodies, riparian planting, limits on areas able to be developed or duration of exposed soils and the prevention of stock entering surface waterbodies <u>and river and lake beds</u>;</p> <p>(c) manage collected and diffuse run-off and leaching of nutrients, microbial contaminants and sediment through the identification and management of higher risk physiographic zones on a regional scale, and critical source areas within individual properties.</p>
216.1	Douglas Monymusk Farms Ltd	Policy 16	Oppose	No specific decision requested.
220.7	Drylands Farming Ltd	Policy 16	Oppose in part	Remove the wording ‘strongly discourage’ and provide a clearer indication of what ‘close proximity’ is.
221.7	DRYSDALE Family Trust	Policy 16	Oppose in part	Remove the wording ‘strongly discourage’ and provide a clearer indication of what ‘close proximity’ is.
229.2	DUNNAGE Tony	Policy 16	Oppose	No specific decision requested.
241.1	Egg Producers Federation of NZ (EPFNZ)	Policy 16	Support in part Oppose in part	<p>Environment Southland to develop an appropriate framework and implementation for an IASM system so that this method can be used by industries such as the poultry industry, where otherwise cannot meet requirements of Rule 20 to which this policy relates.</p> <p>We request that Environment Southland work with the poultry industry to develop an appropriate framework and implementation methods for an IASM system.</p>
249.11	Ernslaw One Ltd	Policy 16	Amend	<p>Add a new subsection (5) to the effect:</p> <p>Where water quality is at, or below, agreed community objectives (or Attribute States as per the NPS-Freshwater), amend the policy to set timelines for Council to:</p> <p>(5) Call in existing discharge consents and reduce the permitted loadings, and add a polluter pays fee, appropriate to the scale and significance of the consented discharge.</p> <p>(6) place an appropriate ‘sinking lid’ on total cow numbers in each of Southland’s physiographic zones (unless housed in herd homes with bio-digesters, and a cut-and-carry feed regime).</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(7) require a resource consent (restricted discretionary ) to apply urea or other nitrogenous fertilisers.
259.4	F D Enterprises Ltd	Policy 16	Oppose in part	Remove the wording strongly discourage and provide a clearer indication of what ‘close proximity’ is.
264.4	FarmRight Ltd	Policy 16	Amend	Remove the wording “strongly discourage”.
265.47	Federated Farmers of NZ (Southland Province)	Policy 16	Oppose in part	<p>Amend as follows:</p> <p>1. <del>Minimising</del>Managing the adverse environmental effects on water and land (including on the quality of water in rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater) from farming activities by:</p> <p>(a) <del>strongly discouraging the establishment of</del>avoiding, mitigating, or remedying the adverse effects of new dairy farming or new intensive winter grazing activities in close proximity to sensitive waterbodies identified in Appendix Q;</p> <p>(b) <del>strongly discouraging applications to establish new, or further intensify existing dairy farming of cows or intensive winter grazing activities where the effects on the quality of water, including eumulatively, of groundwater, waterbodies, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands cannot be avoided or fully mitigated or in areas where water quality is already degraded to the point of being over-allocated.</del></p> <p>2. Requiring all farming activities, including existing activities, to:</p> <p>(a) <del>either implement a Management Plan, as set out in Appendix N, or be listed on the Environment Southland Register of Independently Audited Self-Management Participants</del><u>good management practices;</u></p> <p>(b) actively manage sediment run-off risk from farming and hill country development by requiring setbacks from waterbodies, <del>riparian planting, limits on areas or duration of exposed soils and the prevention of stock entering surface waterbodies;</del></p> <p>(c) manage collected and diffuse run-off and leaching of nutrients, microbial contaminants and sediment <del>through the identification and management of higher risk physiographic zones on a regional scale, and critical source areas within individual properties.</del></p>
277.24	Fonterra Co-operative Group Ltd	Policy 16(1)	Oppose in part	<p>Amend Policy 16 to remove the focus on “strongly discouraging” and instead focus on the effects of the activity that would not be considered acceptable.</p> <p>Delete reference to “fully” or include such other phrase as necessary to ensure the policy focuses</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				on managing effects within acceptable boundaries.  Clarify the meaning of “over-allocated” in the context used
279.24	Forest & Bird NZ	Policy 16	Support with minor amendment	<p>Amend Policy 16 as follows:</p> <ol style="list-style-type: none"> <li><del>Minimising the environmental effects (</del> <u>Maintain, or improve where degraded including</u> <del>on</del> the quality of water in <u>all water bodies including</u> rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater) from farming activities by:</li> </ol> <p>Include reference to “<i>wetlands</i>” and “<i>lakes</i>” in Policy 16(1)(a) and (b);</p> <p>Amend Policy 16 1(a) as follows: (a) <del>strongly discouraging</del> <u>Avoid</u> the establishment of new dairy farming or new intensive winter grazing activities in close proximity to sensitive waterbodies identified in Appendix Q;</p> <p>Amend Policy 16 1(b) as follows: (b) <del>strongly discouraging applications to</del> <u>Avoid</u> the establish new, or further intensify existing dairy farming of cows or intensive winter grazing activities where the effects on the quality of water, including cumulatively, of groundwater, waterbodies, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands <del>cannot be avoided or fully mitigated or in areas where water quality is already degraded to the point of being over-allocated.</del></p> <p>Retain 16(2)(a)-(c).</p>
299.10	GARDYNE John	Policy 16	Oppose	We need a policy for urban activities that affect water quality.
319.10	Glendhu Dairies Ltd	Policy 16	Oppose	The proposed rules in the plan should minimise the effects to overall water quality without using the wording ‘strongly discourage’.
322.6	Glenlapa Station	Policy 16	Amend	Oppose ‘Strongly discourage’ and ‘Close Proximity’. We believe that working with our LSO in conjunction with our FMP, we should be able to achieve satisfactory objectives in this regard.
331.4	GRANT JJ & J L	Policy 16	Oppose	Remove “strongly discouraged”.
341.1	Gunton Farms Ltd (Jeremy Gunton)	Policy 16	Oppose in part	<p>Retain 16(2)(a) and (c).</p> <p>Policy 16(2)(b): Farming activities must be activity managed in relation to environmental issues but not penalised on adverse weather events.</p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
358.10	HASTIE Stephen	Policy 16	Oppose	Environment Southland is an elected body who services its rate payers. If a rate payer has an issue, then their business can then call on ES for their advice and input.
369.10	HENDERSON Michael	Policy 16	Oppose	Until we are confident the physiographic zones are true and correct each land holding should be treated on a case by case scenario.
381.9	HOLDER Wendy & Tom	Policy 16		Delete (a) and (b).
387.4	HORRELL Andrew	Policy 16	Oppose	Review policy recognising that social, cultural and economic factors also affect water quality. Recognise preventing land use change is not a prerequisite to improving water quality. Gain an understanding of farm systems, economics and factors that drive productivity gains and farmer behaviour. Assess the amount of land available for dairy conversion and its likelihood of conversion and if the conversion will negatively impact on water quality. Focus on the adoption of best practice in regard to water quality on farms.
390.13	Horticulture NZ	Policy 16	Support in part Oppose in part	Add to the beginning of Policy 16: <u>Enable the use of land for farming activities while:</u>  Retain Policy 16(2)(a) but clarify how the Register of Independently Audited Self-Management Participants will operate.  Amend Policy 16(2)(b) as follows: Actively manage <u>the risk</u> of sediment run off from farming activities and hill country development by <u>identifying critical source areas and assessing the risk associated with the activity to be undertaken and use mechanisms, such as setbacks from water bodies, riparian plantings <del>limits on areas or duration of exposed soils and the prevention of stock entering surface waterbodies; or sediment control mechanisms to minimise the risk of sediment run off.</del></u>
436.1	KEENAN K D & M	Policy 16	Oppose	Keep up with education and advertisements as opposed to suggested provisions.
437.10	KEMPTHORNE Robert	Policy 16	Oppose in part	Removal and/or amendment of Policy 16 to better reflect the issues of modification within the entire Waiau catchment. Define “close” to be within a certain distance and provide reasoning.
464.6	Landpro Ltd	Policy 16	Oppose in part	The following amendments are sought: Remove the wording ‘strongly discourage’. Provide clarity within the policies which is the highest test, strongly discourage, or strongly discourage unless fully mitigated. We suggest that there should be a timeframe for preparing and operating in accordance with a

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Management Plan, i.e. 12 months from the date of notification of the plan.
484.3	M A Beer & Sons	Policy 16	Oppose	Delete 2 (a).
516.1	MCDONALD Cameron	Policy 16	Oppose	How close is “close proximity” to sensitive waterways?
522.2	McFarm Trust - Pahia	Policy 16	Oppose	Amend to provide a ruling that is fair to all size land holdings. Physiographic science needs to be validated with consultation with the land owners. Provide clarification for properties with mixed physiographic zones.
529.1	MCKAY Alistair	Policy 16	Amend	Amend to be on a stock unit basis and provide for more discussions with farmers, look at it as a case by case.
545.4	MCLEOD Emma	Policy 16	Amend	Reword Policy 1b provide a definition for “close proximity” in terms of standard measurement units.
558.4	MCRAE Natalie	Policy 16	Oppose	Remove paragraph 2 entirely form the Plan.
570.7	MILLER R L & S J Farm Trust	Policy 16	Oppose in part	Reword these points be deleting ‘strongly discouraging’ and replacing them with ‘managing the effects of’.
572.1	Ministry for Primary Industries	Policy 16	Amend	Retain the provision for implementation of any Independently Audited Self-Management (IASM) schemes developed in the future, along with some amendments to provide additional clarity and certainty. Including (i) what the requirements are for IASM scheme participants in order to be listed on the IASM Register (including that they may require a farm environmental management plan) and (ii) the requirements of IASM scheme providers in order to obtain Environment Southland’s approval of either the scheme or the scheme provider.
583.15	MOSEBY Ryan	Policy 16	Amend	Amend wording to move focus from activity based to effects based.
586.1	MOUAT Family Trust	Policy 16	Support	Retain.
590.4	Mt Linton Station	Policy 16	Oppose	Policy 16(2)(b): Agree with requiring setbacks to manage sediment run-off risk but have limits on exposed soils as guidelines only.
604.2	Nokomai Station Ltd	Policy 16	Oppose in part	Council removes the wording ‘strongly discourage’ intensifying wintering activities and provide some clarity around which of the policies Council intends to be read as the highest contest as this is contradictory.
616.3	O’CONNELL Elizabeth	Policy 16	Oppose	That this policy of effectively requiring every waterway to be fenced and planted is unnecessary if indeed sheep are to be excluded from the Stock Exclusion Rule. That waterways already bounded by tussocks be sufficient in terms of a riparian area and there should not be a requirement to fence waterways already bounded by tussock land.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				That the proposal to exclude waterways with a bank of greater than 16° from the Stock Exclusion Rule (specifically relating to cattle), be extended to any waterway over 300m above sea level due to the lower stocking rate.
634.1	PETER Hayden Trust	Policy 16		Amend to include more information required on species fit for purpose; ideally natives, height, ongoing maintenance and depth of roots (for over tile drain outlets).
640.18	Pourakino Catchment Group	Policy 16	Oppose	Delete.
655.4	RABBIDGE Dean	Policy 16	Oppose	No specific decision requested.
656.1	RABBIDGE Stephen	Policy 16	Amend	Enforce a requirement of a Management Plan on non-compliant farmers only.
661.24	Ravensdown Ltd	Policy 16	Oppose in part	Ravensdown seeks for Policy 16 to be deleted and replaced with the following (or similar): <u>“Minimise the adverse effects of farming activities on water quality in rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater by:</u> a) <u>Controlling the establishment of new dairy farming and new intensive winter grazing activities; and</u> b) <u>Requiring all farming activities, including existing activities, to either prepare and implement a Farm Management Plan as set out in Appendix N, or be part of an Independently Audited Self- Management scheme approved by the CEO of the Southland Regional Council.”</u>
681.7	Rockytommy Farming Ltd	Policy 16	Oppose in part	Remove the wording strongly discourage and provide a clearer indication of what “close proximity” is.  Remove having Plan in a “independently Audited Self-Managed participants” but to be produced if required.
682.4	Rokenwai Farming Ltd	Policy 16	Oppose in part	Remove the wording strongly discourage and provide a clearer indication of what ‘close proximity’ is. Remove having Plan in a “Independently Audited Self-Managed Participants” but to be produced if required.
710.1	Schrader Mains Ltd	Policy 16(a)	Oppose	We seek the following amendments: Policy 16(a) strongly discouraging the establishment of new dairy farming or new intensive

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				winter grazing activities <del>in close proximity</del> <u>within 100 metres of the</u> sensitive waterbodies identified in Appendix Q; Delete 16(1)(b)
712.21	Seaview Trust & Oraka Farms Ltd	Policy 16	Oppose	Delete.
717.2	SHALLARD Murray & Jo	Policy 16	Oppose Amend	Change of land use specifically to dairy be a permitted/discretionary activity provided management plans and resource consents clearly meet standards for nutrient use, effluent management, water usage, soil conservation, animal welfare and any new dairy farming activity can prove it will demonstrate best practice(s).
737.12	Smithill Ltd	Policy 16	Support in part Oppose in part	We oppose policy 16(1)(b) however we do support part 2 (a - c) though more information is needed around Environment Southland Register of Independently Audited Self-Management Participants and should be included in the plan.
749.45	Southland Conservation Board	Policy 16	Amend	Amend Policy 16(1) to include: <u>(c) Ensuring that any approvals for freshwater aquaculture take into account the potential adverse effect of aquaculture on water quality and include effective measures to avoid, remedy or mitigate that potential adverse effect.</u> <u>Retain 16(2).</u>
752.60	Southland Fish & Game Council	Policy 16	Oppose	Amend Policy 16(1) as follows: 1. Policy 16(1) - <del>Minimise</del> <u>Avoid, remedy or mitigate</u> the environmental effects (including on the quality of water in <u>all water bodies, including: rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater</u> ) from farming activities; 2. Policy 16(1)(a) - <del>strongly discouraging</del> <u>Avoid</u> the establishment of new dairy farming <u>of cows, or further intensification of existing dairy farming of cows</u> or new intensive winter grazing activities in <del>close proximity</del> sensitive waterbody <u>catchments</u> identified in Appendix Q; 3. Include reference to <i>“wetlands”</i> and <i>“lakes”</i> in Policy 16(1)(a) and (b), this should not be restricted to <i>“coastal lakes”</i> ; and 4. Insert a schedule outlining where “water quality is already degraded to the point of being over-allocated” as referred to in Policy 16(1)(b).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
759.4	Springlands Group Ltd	Policy 16	Oppose in part	The following amendments are sought: Remove the wording “strongly discourage” and provide a clearer indication of what ‘close proximity’ is.
762.2	STANLEY Karen	Policy 16	Support in part	Retain Physiographic Zones. Amend to: High risk zone – 40% intensive grazing, Other zone – 50% intensive grazing. No consent – Part of Farm Management Plan
763.1	STARK W & S	Policy 16	Amend	Best farming practices to be adhered to, to improve water quality relative to climatic conditions.
766.2	STEVENS Brendon	Policy 16	Amend	Remove wording strongly discourage.
773.2	STEWART Rory	Policy 16	Amend	Item (c) needs to be removed from policy.
777.2	STRATFORD Chris & Lynsey	Policy 16	Neutral	Use scientific, effects-based rules. Don't single out dairy farming.
792.7	TAYLER Matthew	Policy 16	Oppose	<ul style="list-style-type: none"> <li>Request more consideration of promoting GMP's and assessing their effectiveness before resorting to regulation and rules.</li> <li>Request timeframes be extended to allow capabilities to be developed.</li> <li>Request ES further resource their land sustainability officers to allow them to work alongside landowners to develop plans. This should be resourced from general rates as the whole community will benefit.</li> <li>Replace “from close proximity” to “in the watershed/upstream” of sensitive waterways identified in Appendix Q.</li> </ul>
797.23	Nga Runanga and TRONT	Policy 16	Support	Amend to read: <ul style="list-style-type: none"> <li>(1) Minimising the environmental effects (including on the quality of water in rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater) from farming activities by: <ul style="list-style-type: none"> <li>(a) <del>Avoiding strongly discouraging</del> the establishment of new dairy farming and strongly discouraging intensive wintering activities in close proximity to sensitive waterbodies identified in Appendix Q.</li> </ul> </li> </ul> Retain (b) as worded. Retain 2 as worded.
803.25	The Fertiliser Association of NZ	Policy 16	Oppose Amend	Delete Policy 16 and replace with the following: <u>Minimise the adverse effects (including on the quality of water in rivers, coastal lakes, lagoons,</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>tidal estuaries, salt marshes and coastal wetlands, and groundwater) of farming activities by:</u></p> <p>(a) <u>avoiding, remedying or mitigating the adverse effects of farming activities on water quality, and</u></p> <p>(b) <u>controlling farming activities in close proximity to the sensitive water bodies in Appendix Q, and</u></p> <p>(c) <u>controlling new intensive farming and intensification of existing farming activities, where effects cannot be avoided, remedied or mitigated, in areas where water quality is already degraded to the point of being over-allocated.</u></p> <p>(d) <u>requiring all farm activities to implement Farm Management Plans as set out in Appendix N that manage:</u></p> <ul style="list-style-type: none"> <li>• <u>sediment loss,</u></li> <li>• <u>diffuse runoff,</u></li> <li>• <u>nutrient leaching and</u></li> <li>• <u>microbial contaminants in waterway, or.</u></li> </ul> <p><u>be listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p> <p><u>(note implementation should be staged to provide for developing capability to deliver, and identifying priority areas).</u></p>
810.18	Three Rivers Catchment Group (TRCG)	Policy 16	Oppose	Delete.
811.10	THYS Herman & STAUT Tinneke	Policy 16	Oppose	We propose removal of the wording new dairy farming and intensive winter grazing, and replace with “intensive farming practise”.
814.2	Timothy Farms Ltd	Policy 16	Oppose in part	We agree with Policy 16(1)(a). However, the rest of this Policy is discriminatory against both the farming industry and individual farmers and their businesses.
820.5	TOPHAM Jeanette	Policy 16	Oppose	Change to “strongly discouraging the establishment of any new farming of livestock, within these areas, and any intensive winter grazing.”
832.32	VAN GOOL Raewyn	Policy 16	Support in part	Retain 16(1) and 16(2)(a)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				16(2)(b) Delete 'or duration of exposed soils'.
871.3	WILLANS Murray & Tarn	Policy 16	Amend	Clarify what "close proximity" means. Is this intended to mean within 1km, 10km or 20km of a sensitive waterbody?
877.20	WILSON Aaron	Policy 16	Oppose in part	Policy 16 should only become operative during the limit setting phase. Paragraph 2 (c) should be re-written to reflect "the management of critical source areas within individual properties."
880.26	WILSON Shannon	Policy 16	Oppose in part	Policy 16 should only become operative during the limit setting phase. Paragraph 2(c) should be rewritten to reflect "the management of critical source areas within individual properties."
888.7	WOOLHOUSE K A & J A	Policy 16	Oppose	Amend to clarify and define what "close" means.
889.3	WRIGHT David	Policy 16	Oppose	Delete. Follow Otago Council and focus on water quality at farm source.

#### Policy 17 – Effluent management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.20	Alliance Group Ltd	Policy 17	Oppose	Delete clause 1 of this policy.
24.36	Aratiatia Livestock Ltd	Policy 17	Support	Retain.
25.10	Ardel Dairies Ltd	Policy 17	Amend	Delete word "avoid".
47.5	Balfour, Wendonside & Waikaia Group	Policy 17	Amend	Amend the policy to read " <del>avoiding</del> <u>prohibiting</u> the discharge of raw sewage and untreated agricultural effluent to water"
80.12	BLAKELY Barney & Stephanie	Policy 17	Amend	Change wording to "No discharge of raw sewerage and untreated agricultural effluent to water."
81.14	BLAKELY Hamish & Hannah	Policy 17	Amend	Change wording to 'No discharge of raw sewage and untreated agricultural effluent to water'.
89.14	BRENTLEIGH Family Trust	Policy 17	Amend	Change wording to "No discharge of raw sewerage and untreated agricultural effluent to water".
108.35	BYTHELL Jesse	Policy 17	Support	Retain.
180.2	CROOYMANS Ton	Policy 17	Oppose	Cover all new dairy yards. Create a holding tank in the yard under a grading system. No further

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				wash water needed.
189.14	Dairy Holdings Ltd	Policy 17		<p>Amend Policy 17(1) as follows:            Avoid <del>as far as practicable</del> adverse effects on water quality, and <del>avoid as far as practicable</del> other adverse environmental effects of the operation of, and discharges from effluent management systems.</p> <p>Amend Policy 17(2)(b) as follows:            maintaining and operating effluent systems in accordance with best practice guidelines; <u>as set out in [x]</u></p> <p>Where [x] refers to relevant industry-recognised best practice guidelines for effluent system, for example Dairy NZ: Farm Dairy Effluent (FDE) Design Standards and Code of Practice (Version 3, September 2015)<sup>3</sup>. Or an updated version of Environment Southland’s Farm Dairy Effluent Best Practice Guidelines published in May 2007.<sup>4</sup></p>
192.5	DALE P T & S B Trust	Policy 17	Oppose	Delete.
205.9	Dillon Ag Ltd (Chris Dillon)	Policy 17	Amend	Change wording to “No discharge of raw sewerage and untreated agricultural effluent to water”.
206.9	Dillon Ag Ltd (Rochelle Dillon)	Policy 17	Amend	Change wording to “No discharge of raw sewerage and untreated agricultural effluent to water”.
210.56	Director-General of Conservation	Policy 17	Support in part	<p>Amend Policy 17 – Effluent management to read:</p> <ol style="list-style-type: none"> <li>1. Avoid adverse effects on water quality, and avoid as far as practicable other adverse environmental effects of the operation of, and discharges from effluent management systems.</li> <li>2. Manage effluent systems and discharges from them by:               <ol style="list-style-type: none"> <li>(a) designing, constructing and locating systems appropriately and in accordance with standards;</li> <li>(b) maintaining and operating effluent systems in accordance with best practice guidelines;</li> </ol> </li> </ol>

<sup>3</sup> Available at: <http://www.dairynz.co.nz/media/2793698/fde-design-standards-and-cop-2015.pdf>

<sup>4</sup> Available at: <http://es.datacomsphere.co.nz/media/5868/fde-dairy-booklet.pdf>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(c) avoiding any surface run-off/overland flow, ponding, <u>or throughflow of effluent to subsurface drains</u> or contamination of water resulting from the application of agricultural effluent to pasture; (d) avoiding the discharge of raw sewage and untreated agricultural effluent to water.
211.2	DITCHFIELD Dylan	Policy 17	Support	I recommend the word "avoiding" be replaced with "prohibiting".
247.4	Environment Southland	Policy 17	Amend	Amend Policy 17(2)(a) as follows: designing, constructing and locating systems appropriately and in accordance with <del>standards</del> <u>best practice guidelines</u> .
249.12	Ernslaw One Ltd	Policy 17	Amend	Require as a condition of consent for all dairy effluent ponds to be covered and methane flared-off or used to heat water or to generate electricity (i.e. methane converted to CO <sub>2</sub> , a less potent greenhouse gas).  Require all dairy sheds to recycle water for stock yard wash-down (thereby increasing water use efficiency and reducing demand on fresh water / reducing volume of effluent) and amend to promote best practice in effluent management.
265.48	Federated Farmers of NZ (Southland Province)	Policy 17	Oppose in part	Amend as follows:  1. Avoid <u>significant</u> adverse effects on water quality, and avoid, <u>remedy, or mitigate as far as practicable</u> other adverse <u>environmental</u> effects <u>on the environment or water quality of from</u> the operation of, and discharges from effluent management systems. 2. Manage effluent systems and discharges from them by: (a) designing, constructing and locating systems appropriately and in accordance with standards; (b) maintaining and operating effluent systems in accordance with <u>best good</u> practice guidelines; (c) avoiding any surface run-off/overland flow, ponding or contamination of water resulting from the application of agricultural effluent to pasture; (d) avoiding the discharge of <del>raw sewage and untreated</del> agricultural effluent to water.
279.25	Forest & Bird NZ	Policy 17	Support	Retain
288.20	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 17	Support in part	Amend Policy 17 to make reference to the specific design standards for effluent systems or remove the reference to standards as follows:  Policy 17 – Effluent management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>1. Avoid adverse effects on water quality, and avoid as far as practicable other adverse environmental effects of the operation of, and discharges from effluent management systems.</p> <p>2. Manage effluent systems and discharges from them by:</p> <p>(a) designing, constructing and locating systems appropriately <del>and in accordance with standards;</del></p> <p>(b) maintaining and operating effluent systems in accordance with best practice guidelines;</p> <p>(c) avoiding any surface run-off/overland flow, ponding or contamination of water resulting from the application of agricultural effluent to pasture;</p> <p>(d) avoiding the discharge of raw sewage and untreated agricultural effluent to water.</p>
410.2	Invercargill Airport Ltd	Policy 17	Support	Retain.
411.15	Invercargill City Council	Policy 17(d)	Support	Retain.
570.8	MILLER R L & S J Farm Trust	Policy 17	Oppose in part	Replace 'avoid' with 'manage'.
583.16	MOSEBY Ryan	Policy 17	Amend	Delete Policy 17, 2 (c) & (d)
586.2	MOUAT Family Trust	Policy 17	Support	Retain.
622.10	P F Olsen Ltd	Policy 17	Amend	Amend to add in a clause to the effect that adoption of new more advanced technologies will be incentivised by way of market transference frameworks.
640.19	Pourakino Catchment Group	Policy 17	Oppose Amend	1. Avoid, <del>remedy or mitigate</del> adverse effects on water quality, and avoid as far as practicable other adverse environmental effects of the operation of, and discharges from effluent management systems.
681.8	Rockytommy Farming Ltd	Policy 17	Amend	Amend the policy to read " <del>avoiding prohibiting</del> the discharge of raw sewage and untreated agricultural effluent to water".
682.5	Rokenwai Farming Ltd	Policy 17	Amend	Amend the policy to read " <del>avoiding prohibiting</del> the discharge of raw sewage and untreated agricultural effluent to water."
725.2	Silver Fern Farms Ltd	Policy 17	Support	Retain.
731.3	SMITH Barry	Policy 17		Use the plan to change the mindset of farms, council staff and members of the public into the thinking that effluent has a high intrinsic value to anyone using it.
749.46	Southland Conservation Board	Policy 17	Support	Retain.
752.61	Southland Fish & Game	Policy 17	Support	Retain Policy 17 as notified and make the following amendment to Policy 17(1):

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council		Amend	<p>“1. Avoid adverse effects on water quality, and avoid <del>as far as practicable</del>, <u>remedy or mitigate</u> other adverse environmental effects of the operation of, and discharges from effluent management system.”</p> <p>Amend Policy 17(2)(c) to provide:  “(c) avoiding any surface run-off / overland flow, ponding <u>or through flow of effluent to sub-surface drains</u> or contamination of water resulting from the application of agricultural effluent to pasture.”</p>
759.5	Springlands Group Ltd	Policy 17	Amend	Amend the policy to read “ <del>avoiding prohibiting</del> the discharge of raw sewage and untreated agricultural effluent to water”
766.3	STEVENS Brendon	Policy 17	Amend	Amend the policy from “avoiding” to “prohibiting”.
797.24	Nga Runanga and TRONT	Policy 17	Oppose in part	<p>Amend to read:</p> <p>1. <del>Avoid adverse effects on water quality, and avoid as far as practicable other adverse environmental effects of the operation of, and discharges from effluent management systems.</del> <u>Avoid as far as practicable adverse environmental effects of the operation of, and discharges from, effluent management systems.</u></p> <p>Retain 2 as worded.</p>
802.9	The 254 Partnership & Gerken Family Trust	Policy 17	Amend	Change wording to “No discharge of raw sewerage and untreated agricultural effluent to water”.
810.19	Three Rivers Catchment Group (TRCG)	Policy 17	Oppose Amend	Avoid, remedy or mitigate adverse effects on water quality, and avoid as far as practicable other adverse environmental effects of the operation of, and discharges from effluent management systems.
811.11	THYS Herman & STAUT Tinneke	Policy 17	Support	Retain provided the best practice guidelines are industry standards.
832.33	VAN GOOL Raewyn	Policy 17	Support	Retain.
877.21	WILSON Aaron	Policy 17	Support in part	Water and Land Plan needs to define what the term “standards” mean with regard to 2(a).
880.27	WILSON Shannon	Policy 17	Support in part	W&L plan needs to define what the term “standards” mean with regard to 2(a).

## Policy 18 – Stock exclusion from waterbodies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
3.1	A P & S M Verhaegh Ltd	Policy 18	Amend	All stock contributes to the quality of waterways and exclusion of all stock would have better impact on waterways.
11.2	Agribusiness Consultants Ltd	Policy 18	Oppose	Delete Policy 18 – conduct further research into the matters of bank stability.
14.1	ALLAN Frazer & Karen	Policy 18	Amend	Historical dams and springs used for stock water above 16 degree slopes and above an altitude of 300m be a permitted activity. Inspected once to get sign off.
24.37	Aratiatia Livestock Ltd	Policy 18	Support in part	Sheep should not be exempt from the intent of this provision. This is a policy and should be “aspirational”. If ES believes that a concession needs to put in place for say hill country sheep farmers then an exemption in the relevant “rule” is the appropriate vehicle. We would like to see Council amend this policy to specifically include sheep.
25.11	Ardel Dairies Ltd	Policy 18	Oppose in part	Delete requirement to exclude stock in hill country.
32.6	B D Farm Trust	Policy 18	Support Amend	Amend to exclude artificial waterways and provide for animal welfare, stock movement pattern and health & safety issues. Include a “where practical clause”.
40.2	BAKER David	Policy 18	Amend	Exclude the small streams and creeks on the bedrock/hill country from having to be fenced. Exclude the very extensive low stocking rate properties from having to be fenced. Extend the dead line to fence deer out of waterbodies until 2025. Clarify the distance from the waterbody to be fenced is 3 metres.
47.6	Balfour, Wendonside & Waikaia Group	Policy 18	Oppose in part	Clarify the intent of the policy and what might be an acceptable level of management.
62.4	Beef + Lamb NZ	Policy 18	Support in part Amend	Amend to read: “... 4. ensuring that when stock access waterbodies, <del>including artificial watercourses</del> , this is managed in a manner that avoids significant adverse effects on water quality, bed and bank integrity and stability, mahinga kai, and aquatic, river and riparian ecosystems and habitats.”
64.11	BELGARD Family Trust (GA & JM Rauber)	Policy 18	Amend	Dairying is being unfairly discriminated against. It is assuming that dairying will further degrade water quality.
66.1	Ben Callum Station Ltd	Policy 18	Oppose	Oppose cost of excluding stock from extensive hill country blocks, where they cause little impact.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
80.13	BLAKELY Barney & Stephanie	Policy 18	Support Oppose	Remove restrictions on hill country.
81.15	BLAKELY Hamish & Hannah	Policy 18	Oppose Support	Support the exclusion of sheep. Oppose the remainder. The hill country is best managed by the farmers. Timed grazing prevents a lot of erosion on drains and river banks.
89.15	BRENTLEIGH Family Trust	Policy 18	Oppose	Support the exclusion of sheep. Oppose the remainder.
92.3	Bristol Grove Dairies	Policy 18		Agree stock need to be excluded from naturally occurring waterbodies, however man-made waterbodies created for the purpose of sport, irrigation or stock water should be excluded from this policy in accordance with soil conditions.
97.2	Brunel Peaks Ltd	Stock Exclusion	Amend	Exclude water courses less than one metre wide. Exclude cattle at low stocking rate on extensive grazing. Exclude flat high country paddocks from fencing rule and support sheep not being included in Rule.
108.36	BYTHELL Jesse	Policy 18(3)	Support	I would like to see Policy 18 (3) amended to include the phrase 'locally appropriate' so it reads, 'encouraging the establishment and enhancement of healthy vegetative cover in riparian areas, particularly through the use of <u>locally appropriate</u> indigenous vegetation.'
112.1	CADE Andrew	Policy 18	Oppose	Amend to make more practical.
113.1	CADE Errol	Policy 18	Oppose	No specific decision requested.
126.2	Cheviot Downs Ltd	Policy 18(2)	Oppose	Remove requirements for submission of Farm Management Plans.
133.1	Civil Tech Ltd	Policy 18(3)	Amend	Planting native trees along waterways will do nothing for the environment. Amend to encourage vegetative cover in riparian and critical source areas, particularly through the use of high nutrient absorbing or native vegetation.
153.1	Coalbrook Partnership	Policy 18	Support	Retain.
172.8	COWAN Les & Christine	Policy 18	Oppose	Replace with Policy that allows farmers to farm the way they know best.
185.2	D J & D A Anderson Ltd	Policy 18(1)	Amend	Discretion for extensively run hill country properties i.e. cultivated hill per SU basis or degrees and uncultivated hill per SU basis. Consideration to the environment to protect the soils and water from quality degradation.
186.2	D R & J A E Pullar Ltd	Policy 18	Amend	Goats should be treated in the same way as sheep by the rule and by the plan as a whole
189.15	Dairy Holdings Ltd	Policy 18		Amend Policy 18 as follows: Reduce sedimentation and microbial contamination of <u>surface</u> waterbodies, <del>and</del> <u>natural wetlands</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>and modified watercourses</u> to improve river and riparian ecosystems and habitats by:</p> <ol style="list-style-type: none"> <li>1. requiring progressive exclusion of all stock, except sheep, from <del>all surface</del> waterbodies, <del>including natural wetlands, artificial watercourses and modified watercourses, on land with a slope of less than 16° by 2025, and management of sheep in critical source areas;</del></li> <li>...</li> <li>4. ensuring that when stock access <u>surface</u> waterbodies, <del>including natural wetlands</del> <u>artificial watercourses and modified watercourses</u>, this is managed in a manner that avoids significant adverse effects on water quality, bed and bank integrity and stability, mahinga kai, and aquatic, river and riparian ecosystems and habitats.</li> </ol>
190.12	DairyNZ	Policy 18		Amend to consolidate planning requirements, and more effectively utilise existing planning approaches (e.g. Sustainable Milk Plans) that are being used at the national level rather than introducing customised arrangements that have the potential to duplicate existing initiatives and increase business compliance costs. Amend to be consistent with existing initiatives.
191.5	DALE J M & K B	Policy 18	Amend	Sheep should be included in all stock exclusion policy.
199.1	DICKIE Alan & Valerie	Policy 18	Support	Retain.
201.1	DICKSON Andrew	Policy 18	Oppose	Fencing of waterbodies is not required on hill country.
205.10	Dillon Ag Ltd (Chris Dillon)	Policy 18	Support Oppose	Support the exclusion of sheep. Oppose the remainder. Allow timed grazing.
206.10	Dillon Ag Ltd (Rochelle Dillon)	Policy 18	Support Oppose	Support the exclusion of sheep. Oppose the remainder. Allow timed grazing.
210.57	Director-General of Conservation	Policy 18	Support in part	<p>Amend to read:</p> <p>Policy 18 – Stock exclusion from waterbodies <u>river and lake beds and riparian margins</u></p> <p>Reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats by:</p> <ol style="list-style-type: none"> <li>1. requiring progressive exclusion of all stock, <del>except sheep,</del> from all waterbodies, including artificial watercourses, on land with a slope of less than 16° by 2025, <u>and from this land's river and lake beds, and the management of sheep in critical source areas;</u></li> <li><u>2. requiring the removal of all stock on marginal strips, unformed road adjacent to crown river and lake bed where the waterbody is present, to create riparian buffers.</u></li> <li>3. requiring the adoption of management plans that set out methods and timeframes to achieve these outcomes;</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				4. <del>encouraging</del> <u>ensuring</u> the establishment and enhancement of healthy vegetative cover in riparian areas, particularly through use of indigenous vegetation; 5. ensuring that when stock access waterbodies, including artificial watercourses, this is managed in a manner that avoids significant adverse effects on water quality, bed and bank integrity and stability, mahinga kai, and aquatic, river and riparian ecosystems and habitats.
216.2	Douglas Monymusk Farms Ltd	Policy 18	Oppose	Delete Policy 18(3). Permanent waterways need to be the priority over artificial waterways etc.
219.4	DRUMMOND R G & J M	Stock Exclusion	Oppose	Amend so fencing out cattle can be targeted e.g. cattle finishing areas say area's that have 40% cattle use and then high risk area's such as main streams and/or streams with higher banks where cattle grazing happens only occasionally, OR give farmers option of doing LEP with above options.
220.8	Drylands Farming Ltd	Policy 18	Support Amend	We would like to see and would support research towards bank erosion and the sediment issues it creates.
221.8	DRYSDALE Family Trust	Policy 18	Support Amend	We would like to see and would support research towards bank erosion and the sediment issues it creates.
229.3	DUNNAGE Tony	Policy 18	Support	Retain.
245.2	Enfield Ltd	Policy 18	Amend	Allow managed grazing of these areas prior to planting can open up the pest plants so they can be managed more effectively.
249.13	Ernslaw One Ltd	Policy 18	Support Amend	Add provision to Policy 17 requiring stock exclusion on land steeper than 16 degrees, with amendment to align with Rule 23, requiring stock exclusion: 20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees;
265.49	Federated Farmers of NZ (Southland Province)	Policy 18	Oppose	Amend by: Reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats by: 1. requiring <del>progressive</del> exclusion of <del>all</del> stock, except sheep, from <del>all</del> waterbodies, <del>including artificial watercourses, where the effects of access are more than minor on land with a slope of less than 16° by 2025, and the management of sheep in critical source areas;</del> 2. requiring the adoption of <del>management plans</del> <u>good management practices</u> that set out methods and timeframes to achieve these outcomes; 3. encouraging the establishment and enhancement of healthy vegetative cover in riparian areas <u>where there is significant risk of sedimentation and overland flow containing contaminants,</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				particularly through use of indigenous vegetation, <u>without compromising the effective management of pests, flooding, and bank erosion</u> ; 4. ensuring that when stock access waterbodies, <del>including artificial watercourses</del> , this is managed in a manner that avoids significant adverse effects on water quality, bed and bank integrity and stability, mahinga kai, and aquatic, river and riparian ecosystems and habitats.
274.1	FLECK W S & K M	Policy 18	Support	Apply to all animals, particularly on intensive lowland properties. Difficult in hill country.
277.25	Fonterra Co-operative Group Ltd	Policy 18	Oppose in part	Amend the policy as follows – “Reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats by: 1. requiring progressive exclusion of all stock, except sheep, from <u>wetlands, lakes and the active beds of all other waterbodies</u> , including artificial watercourses, on land with a slope of less than 16° by 2025, and the management of sheep in critical source areas;” Include a definition of “active bed” as follows: “ <u>Means the bed of a river (including any modified river) or artificial watercourse or that is permanently or intermittently flowing and where the bed is predominantly un-vegetated and comprises sand, gravel, boulders or similar material.</u> ”
279.26	Forest & Bird NZ	Policy 18	Support with minor amendment	Amend Policy 18 as follows: Reduce sedimentation <u>nutrient</u> and microbial contamination of waterbodies <u>and coastal lakes and estuaries</u> and improve river <del>and</del> riparian <u>and estuarine</u> ecosystems and habitats by:  1. requiring progressive exclusion of all stock, <del>except sheep</del> , from all waterbodies, including artificial watercourses, on land with a slope of less than 16° , <u>including sheep from sensitive water bodies including coastal estuaries and lagoons and critical source areas</u> by 2025,
292.7	G S & M A Clearwater Ltd	Policy 18	Amend	Provide clarification around the 16-degree slope and critical source areas. If a waterway is a critical source area will sheep need to be fenced out, by 2025?
296.2	GARDYNE G W & E L Trust & C K Gardyne Ltd	Policy 18	Support	Retain the use of sheep grazing, as one of the tools in managing the vegetation around water bodies.
297.7	GARDYNE Hugh & Kathie	Policy 18		Amend policy 18 to a slope of less than 30 degrees.
299.11	GARDYNE John	Policy 18	Oppose	Have a stocking rate where no fencing required i.e. 6 su/ha.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
300.11	GARDYNE Jonathan	Policy 18	Support	I support the council decision to allow sheep to graze the banks of the river.
304.1	Gavenwood Farm	Policy 18	Support	Retain Policy 18(1).
322.7	Glenlapa Station	Policy 18	Amend	In all waterbodies where we have low stocking rates e.g. less than 8 stock units per hectare we do not want the exclusion as per Policy 18.1. Retain Policy 18.4
331.5	GRANT J J & J L	Policy 18	Amend	Further work is needed on definition and explanation on economic impact versus benefit (s32 analysis).
332.1	GRANT Robert	Policy 18	Oppose	Stock exclusion from artificial watercourses in hill country should only apply for intensive winter grazing in winter months.
338.1	GUNN Graeme	Policy 18	Oppose Amend	Remove reference to indigenous vegetation in Policy 18(3), while well intentioned, large vegetation does not provide a good sediment trap or allow cleaning of waterway.
341.2	Gunton Farms Ltd (Jeremy Gunton)	Policy 18	Amend	Amend 18(1): Fencing of all waterbodies that incorporate farming practices running 15su/ha or greater annually and/or: fencing waterbodies that are (a) 1.0 metres wide or greater; or (b) flow at 0.5 cu mets/s or greater. Retain 18(2), (3) and (4).
348.1	HAMILTON Blair	Policy 18	Oppose	When a water system with troughs is available stock doesn't enter streams. An allowance for this is required.
355.3	HARRIS David	Policy 18	Amend	Change date to 2021.
358.11	HASTIE Stephen	Policy 18	Oppose	A better understanding from ES of actual associated costs for fencing off every waterbody.
384.2	HOPCROFT Bevan & Wendy	Policy 18	Support	Retain.
387.5	HORRELL Andrew	Policy 18	Support	Retain.
396.1	HUGHES Christopher	Policy 18	Oppose	Allow stock to graze creek paddocks as long as stocked at less than 10 per hectare.
437.11	KEMPTHORNE Robert	Policy 18	Oppose in part	Amend or make provision for future rates relief for all parties permanently retiring land for riparian planting purposes on the basis of their formally submitted farm maps and management plans. Increase the time frames for full compliance by at least 2 additional years.
437.12	KEMPTHORNE Robert	Policy 18	Oppose in part	Amend wording to remove statement that "indigenous vegetation" with "appropriate/suitable".
444.2	KING Henry	Policy 18		This must be farm specific, with sensible guidelines. This is unworkable and unfair to anyone who has a main mountain fed river running through it.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
460.2	LAIDLAW Graham	Policy 18	Oppose	No specific decision requested.
467.6	Lawrence Farms Ltd (Gavin Lawrence)	Policy 18	Oppose	Oppose Policy 18(1), use science and common sense. If small areas have filtration ponds etc. and by testing the water it is not being degraded, why fence whole areas? The council should take into account the financial implications of this decision.
468.1	Lawrence Farms Ltd (Charles Lawrence)	Policy 18	Amend	No waterway fencing required where low density deer grazing is practice.
470.1	LIETZE Janet & David	Policy 18	Oppose	Remove blanket stock exclusion on all waterways and allow farmers to recognise these areas and take a management approach to them rather than having complete stock exclusion.
483.13	Ludell Ltd	Policy 18	Amend	Sheep should be included in all stock exclusion policy.
486.1	M Gardyne Ltd	Policy 18	Amend	Amend to allow sheep grazing along water bodies periodically.
490.1	MACDONALD James	Policy 18	Amend	I would like Environment Southland to allow unfenced waterbodies in areas where the stocking rate is light and moderate. This being hill country and land that is not developed.
515.3	MCCROSTIE Ray	Policy 18	Amend	The decision I would like Environment Southland to make is: To require stock be excluded from waterways unless they are being used to control vegetation (during the summer and autumn months).
516.2	MCDONALD Cameron	Policy 18	Oppose	Instead of fencing off all waterways a sedimentary trap might achieve the same outcome especially where water leaves your property.
526.3	MCINTYRE Peter	Policy 18	Amend	That in the farm environment plan the land owner has mechanisms in place to manage stock access to water where it is not practical to fence stock out.
547.11	MCMULLEN G F	Policy 18	Oppose	Agree with fencing them off from major creeks but not every water body.
558.5	MCRAE Natalie	Policy 18	Oppose	Remove paragraph 1 and 2.
569.4	MILLER R J Trust	Policy 18	Support	We believe all waterways should be fenced, regardless of what animals are grazing nearby. Amend Policy 18(1) to read prohibiting the discharge of raw sewage and untreated agricultural effluent to water.
570.9	MILLER R L & S J Farm Trust	Policy 18	Oppose in part	Delete the reference to slope. Implement Good Management Practices before adopting Management Plans.
576.2	MOIR Joseph	Policy 18	Neutral	Extend the dead line for stock exclusion to 2035-2040, or put it on a progressive approach excluding from larger waterbodies first making our way to all water bodies by 2035.
583.17	MOSEBY Ryan	Policy 18	Amend	Adopt GMP approach through Appendix N, allow more time for farmers to complete significant

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				capital work.
586.3	MOUAT Family Trust	Policy 18	Amend	Amend to consider deer farming practices, deer behaviour with waterways and financial cost of deer fencing waterways.
590.5	Mt Linton Station	Policy 18	Oppose	This should be based on a stocking rate policy so fencing where intensively managed and where practical otherwise with mitigations to limit contaminant loss.
591.1	Mt Nicholas Station	Policy 18		For Policy 18 to be examined in detail and amended in reference to “High Country area” and amended in discussion on the following issues: <ul style="list-style-type: none"> <li>a. We consider this policy is not fit for purpose for extensively farmed high country areas;</li> <li>b. Strategic fencing identified as a result of farm management planning is a more appropriate method to address highly stocked areas or sensitive site;</li> <li>c. Blanket fencing rules are likely to have erroneous and unintended consequences such as weed spread, river channel entrainment, aesthetic change of the landscape and further landscape segmentation and subsequent land use intensification (even in respect of other rules in the proposed plan), undermining the intent of the plan in this area.</li> </ul>
606.1	Norham Farm Ltd	Policy 18		Retain the policy of sheep not to be required to be fenced from waterbodies. Tussock high country beef farmers should be exempt from having to fence waterways from beef cattle, while much of this country may have a slope greater than 16°, it need to be very clear that this higher country is exempt. In all reality there is little of this country in Southland so this would be easily implemented. Sheep and Beef Cattle on high country should be excluded from this policy, even ‘critical source areas’ unless it is proven via water quality testing that sheep are creating nutrient run off at a disproportionately large amount.
609.2	NZ Deer Farmers Assoc. – Southland Branch (Richard Cook)	Policy 18	Amend	Amend Policy 18(1) to read: <u>1.1 requiring progressive exclusion where possible and practical of all stock, except sheep, from all waterbodies, including artificial watercourses, on land with a slope of less than 16° within ten years of the plan becoming operational, and the management of sheep in critical source areas;</u> <u>1.2 where exclusion is not possible or practical, alternative mitigation measures to reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats are provided in a Management Plan;</u> Clarify for Policy 18(1): the practicality of defining slope angle and what area of paddock within the slope is required for stock exclusion to be effected. Clarify for Policy 18(4): What constitutes a <u>significant</u> adverse effect and whether stock crossing of waterbodies, where this is infrequent and of short duration, contravenes Policy 18.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
610.1	NZ Deer Farmers Association – Southland Branch (Graham Murdoch)	Policy 18	Amend	Need to extend time out at least to 2027 and, where exclusion is not possible, look at affordable solutions.
616.4	O'CONNELL Elizabeth	Policy 18	Oppose	That waterways already bounded by a tussock area be exempt from fencing. That waterways above 300m above sea level be exempt in recognition of the lower farming intensity above this altitude.
617.1	O'NEIL Craig & Colleen	Policy 18	Oppose	Hill country farming should be excluded from the stock access to waterways policy.
622.11	P F Olsen Ltd	Policy 18	Support Amend	Add provision to Policy 18. Consider an adjustment that management plans are also required for land over 16 degrees and must address how sedimentation and nutrient, bacterial levels will be minimised in what are essentially upper catchment and normally naturally pure waterbodies.
627.3	PATERSON Ross	Policy 18	Amend	Environment Southland should help out here financially. Retain 18(1)
628.4	PATERSON Stephanie	Policy 18	Amend	Environment Southland should look into some form of subsidising for fenced areas. Perhaps subsidising native plants etc. Retain 18(1).
640.20	Pourakino Catchment Group	Policy 18	Amend	3. encouraging the establishment and enhancement of healthy vegetative cover in riparian areas; <del>particularly through use of indigenous vegetation;</del>
655.5	RABBIDGE Dean	Policy 18	Amend	Extend timeframes.
666.8	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 18	Support	Retain.
674.1	ROBINS Sam	Policy 18	Oppose	Exclude the need to fence off ephemeral waterbodies.
681.9	Rockytommy Farming Ltd	Policy 18	Oppose in part	Further clarification from Environment Southland is sought with regards to this policy, specifically what determines a critical source area.
683.1	Ron J Stewart & Co	Policy 18	Oppose	If this Policy is implemented an exemption should be made for hill/high country farming or council should contribute 70% of fencing, water scheme costs.
710.2	Schrader Mains Ltd	Policy 18		Delete the wording “except sheep” in Policy 18(1)
717.3	SHALLARD Murray & Jo	Policy 18	Support Amend	Progressive exclusion should include large mobs of sheep from permanent running water between months of 1/May – 1/September.
727.1	SLOAN P J & J M	Policy 18	Amend	Policy 18(1): Explain where these figures come from, explain “what about steeper than 16

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				degrees”.
731.4	SMITH Barry	Policy 18		Clarify the application of the 16 degree limit and resubmit the comment to affected parties.
733.12	SMITH Hamish & Karen	Policy 18		Amend Policy 18 to allow a small number of cattle to graze integrated with the sheep (e.g. set a low stocking rate limit for cattle here).
742.4	South Island Eel Industry Association	Policy 18		Policy 18 is unacceptable, and needs to be changed to: requiring immediate exclusion of all stock, except sheep, from all waterbodies, including artificial watercourses, in intensive grazing areas and on land with a slope of less than 16°, and the management of sheep in critical source areas;
747.3	Southern Star Farms Ltd	Policy 18	Amend	To require stock be excluded from waterways unless they are being used to control vegetation (during summer and autumn months).
749.47	Southland Conservation Board	Policy 18	Support	Retain.
752.62	Southland Fish & Game Council	Policy 18	Support Amend	<p>Amend Policy 18, 18(1) and (4) to provide:</p> <p><b>“Policy 18 – Stock exclusion from waterbodies <i>and riparian margins</i></b></p> <p>Reduce sedimentation, <u>nutrient</u> and microbial contamination of waterbodies and improve <u>lake river, lagoon, and riparian and estuarine</u> ecosystems and habitats by:</p> <p>1. Requiring progressive exclusion of all stock, <del>except</del> <u>including sheep in some circumstances</u>, from all waterbodies <u>and their margins</u>, including artificial watercourses, on land with a slope less than 16° by 2025, and the management of sheep in critical source areas.”</p> <p>...</p> <p>4. Ensuring that when stock access waterbodies, including artificial watercourses, this is managed in a manner that avoids significant adverse effects, <u>including cumulative effects</u> on water quality, bed and bank integrity and stability, mahinga kai and aquatic, river and riparian ecosystems and habitats.”</p> <p>Amend Policy 18 to include the following bullet points:</p> <p>1. <u>On land under 16° slope where sheep exclusion is not required ensure that sheep are excluded from areas which form a critical source for contaminants and sediments losses by 1 May 2022.</u></p> <p>2. <u>On land over 16° slope (hill country) and for extensively farmed stock ensure that cattle and</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>deer are excluded from areas which form a critical source for contaminant and sediment losses by 1 May 2020.</u></p> <p>3. <u>Where stock are excluded from the waterbody through placement of a permanent fence then setback distances are established which is equal to or greater than 5m and takes into account GMP, sensitivity of the receiving environment, and risk of contaminant losses to surface water, and protection of the ecological health of freshwater habitats.</u></p> <p>4. <u>All stock, including sheep, shall be excluded from all natural wetlands by the year 1 May 2022 or sooner (depending upon requirements in Rule 70) on all land less than 16°.</u></p> <p>5. <u>Sheep shall be excluded from the following catchments on all land less than 16° by the year 1 May 2022:</u></p> <ul style="list-style-type: none"> <li>a. <u>Otautau Stream;</u></li> <li>b. <u>Opouriki Stream; and</u></li> <li>c. <u>Winton Stream.</u></li> </ul> <p>Sheep exclusion should be required on any other waterbodies that are subsequently found by the Council to failing the secondary contact bottom line in NOF and showing positive signatures for sheep E.coli.</p>
759.6	Springlands Group Ltd	Policy 18	Oppose in part	Provide further clarification with regard to this policy.
762.3	STANLEY Karen	Policy 18	Support	Where it is not practical to fence off waterbodies, identify critical source areas and manage in farm environmental plan.
763.2	STARK W & S	Policy 18	Support	Retain.
768.7	STEVENSON Audrey	Policy 18	Amend	Amend to include all stock but let farmers graze waterways when they are dry. Reconsider costs and timeframe.
773.3	STEWART Rory	Policy 18	Oppose	Change 16 degrees to 10 degrees. Beef cattle need to be excluded along with sheep above 10 degrees. Government needs to pay for the fencing.
774.2	STEWART Vanessa	Policy 18	Oppose	Make it simpler and consult more with farmers. Make it less of a financial burden on the farmers. If you want to fence it off waterways then you need to provide them with financial support or incentives. And allow diggers to remove weed and sediment from problem water bodies would be more environmentally friendly.
780.1	Strathfair Farms	Policy 18	Support	We need time to do fencing.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
792.8	TAYLER Matthew	Policy 18	Amend	ES need to provide landowners maps based on beacon/GIS identifying all waterways from which stock are to be excluded. For clarity, exempt the hill country and alpine zones from stock exclusion provided they comply with condition 4) as these maps are already available (limits cost, aides clarity) and focus on a 15 degree slope in other physiographic zones. Recognise that indigenous vegetation enhanced by landowners is not naturally occurring and therefore not subject to the same constraints/regulations as that naturally persisting.
797.25	Nga Runanga and TRONT	Policy 18	Support	Retain.
802.10	The 254 Partnership & Gerken Family Trust	Policy 18	Oppose	Support the exclusion of sheep. Oppose the remainder.
810.20	Three Rivers Catchment Group (TRCG)	Policy 18	Amend	3. encouraging the establishment and enhancement of healthy vegetative cover in riparian areas; <del>particularly through use of indigenous vegetation;</del>
811.12	THYS Herman & STAUT Tinneke	Policy 18	Support	Retain. Sheep access to waterbodies should be managed.
814.3	Timothy Farms Ltd	Policy 18	Oppose	We think all stock should be excluded from waterways.
828.2	Twin Farm Ltd	Policy 18	Support	Retain.
837.1	Venlaw Ltd	Policy 18	Amend	Stocking rate per hectare should be considered in ES decision. E.g. 1 cattle su/hectare.
832.34	VAN GOOL Raewyn	Policy 18	Support	Retain.
860.1	WHITE John (Richard)	Policy 18	Support	Retain.
865.2	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Policy 18	Amend	Change the 16 degree slope stock exclusion to allow stock access to historical dams and springs over 300m.
876.1	Wilriskit Ltd	Policy 18	Amend	Remove reference to sheep with stock exclusion policy.
877.22	WILSON Aaron	Policy 18	Support in part	Retain.
880.28	WILSON Shannon	Policy 18	Support in part	Retain.
881.2	Windyridge (Fleming) Ltd	Policy 18	Support	Retain Policy 18 1,3,4.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Farm			

### Policy B7 of the NPS for Freshwater Management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.38	Aratiatia Livestock Ltd	Policy B7	Support	Retain.
197.5	DEVINE Wade	Policy B7	Neutral	Any offtake off water for commercial sale or gain must be subject to substantial royalties for the benefit of Southland and funds used to support infrastructure for the public benefit and or reduce rates. Freshwater outflow from Deep Cove is a waste of a natural resource and as such should be harvested and sold to the world for the benefit of Southland. There is no good reason why this can't be done in an environmentally friendly manner.
277.26	Fonterra Co-operative Group Ltd	Policy B7	Oppose	Delete.
288.21	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy B7	Support in part	Include a reference to the NPS Freshwater in the Statutory Framework Section of the plan.
348.2	HAMILTON Blair	Policy B7	Amend	Amend to include a requirement to consider the financial effects of water policy.
664.14	Real Journeys Ltd	Policy B7		It should be made clearer that this policy is lifted straight out of National Policy Statement for Freshwater Management 2014.
749.48	Southland Conservation Board	Policy B7	Support	Retain.
877.23	WILSON Aaron	Policy B7	Support	Retain.
880.29	WILSON Shannon	Policy B7	Support	Retain.

### Policy 20 – Management of water resources

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.21	Alliance Group Ltd	Policy 20	Support	Retain



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.39	Aratiatia Livestock Ltd	Policy 20	Support	Retain.
108.37	BYTHELL Jesse	Policy 20	Support	Retain.
172.9	COWAN Les & Christine	Policy 20	Oppose	Delete.
189.16	Dairy Holdings Ltd	Policy 20		Retain with minor amendment and amend 20(1)(g) as follows: the rights of lawful existing users; <u>including those with existing, but not yet implemented, resource consents, and those taking water as of right pursuant to s14(3)(b) of the Resource Management Act 1991;</u>  Amend Policy 20(2)(b) as follows: the reliability of supply for existing groundwater users, <u>including those with existing, but not yet implemented, resource consents for groundwater take and use and those taking water as of right pursuant to s14(3)(b) of the Resource Management Act 1991;</u>
209.15	DIPROSE Dave	Policy 20	Support	Retain.
210.58	Director-General of Conservation	Policy 20	Support in part	Amend Policy 20 to read; <u>Policy 20 – Management of water resources</u> Manage the taking, abstraction, use, damming or diversion of surface water and groundwater by <u>developing environmental flows and levels water allocation regimes</u> so as to: 1. <u>avoid effects on significant matters, and avoid</u> remedy or mitigate adverse effects <u>on other matters</u> from the use and development of surface water resources on: (a)..(j) Retain as notified. <u>(2) avoid adverse effects on the significant values of surface water, its flows and levels, particularly in spring-fed streams, and its aquatic ecosystems and habitats from the use and development of groundwater resources.</u>  (3) avoid, remedy or mitigate significant adverse effects from the use and development of groundwater resources: (a) long-term aquifer storage volumes; (b) the reliability of supply for existing groundwater users; and <u>(4) maintain groundwater quality where it has not been degraded and where it has been degraded reduce contaminant losses to groundwater through management of irrigation;</u> 5. ensure water is used efficiently and reasonably by requiring that the rate of abstraction and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				abstraction volumes specified on water permits to take and use water are no more than reasonable for the intended end use; 6. recognise the positive effects resulting from the use and development of water resources.
247.5	Environment Southland	Policy 20	Amend	Amend Policy 20(3) as follows: ensure water is used efficiently and reasonably by requiring that the rate <u>and volume</u> of abstraction <del>and abstraction volumes</del> specified on water permits to take and use water are no more than reasonable for the intended end use <u>following the criteria established in Appendix O</u> ;
265.50	Federated Farmers of NZ (Southland Province)	Policy 20	Oppose in part	Amend Policy 20(1)(e) as follows: the spiritual and cultural values <del>and beliefs</del> of tangata whenua; Amend Policy 20(4) as follows: <del>provide for recognise the positive effects resulting from</del> the use and development of water resources, <u>and recognise the positive effects resulting from such use.</u>
277.27	Fonterra Co-operative Group Ltd	Policy 20	Support in part	Retain subclauses (3) and (4) of Policy 20; and Amend Policy 20 so as to read: “Policy 20 – Management of water resources Manage the taking, abstraction, use, damming or diversion of surface water and groundwater so as to: 1. avoid, remedy or mitigate <u>significant</u> adverse effects from the use and development of surface water resources on: (a) the quality and quantity of aquatic habitat; (b) natural character values, natural features, and amenity, aesthetic and landscape values; (c) areas of significant indigenous vegetation and significant habitats of indigenous fauna; (d) recreational values; (e) the spiritual and cultural values and beliefs of tangata whenua; (f) water quality, including temperature and oxygen content; (g) the rights of lawful existing users; (h) groundwater quality and quantity; (i) historic heritage values; (j) mātaihai, taiāpure and nohoanga; 2. avoid, remedy or mitigate significant adverse effects from the use and development of

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>groundwater resources <u>on</u>:</p> <ul style="list-style-type: none"> <li>(a) long-term aquifer storage volumes;</li> <li>(b) the reliability of supply for existing groundwater users;</li> <li>(c) surface water flows and levels, particularly in spring-fed streams, and aquatic ecosystems and habitats; and</li> <li>(d) water quality <u>(as specifically identified in the relevant Water Quality policies)</u>;</li> </ul> <p>3. ensure water is used efficiently and reasonably by requiring that the rate of abstraction and abstraction volumes specified on water permits to take and use water are no more than reasonable for the intended end use;</p> <p>4. recognise the positive effects resulting from the use and development of water resources.</p> <p><u>5. when considering levels of abstraction, recognise the need to exclude takes for non-consumptive uses that return the same amount (or more) water to the same aquifer.”</u></p>
279.27	Forest & Bird NZ	Policy 20		<p>Amend Policy 20 as follows:</p> <p>1. avoid, <del>remedy or mitigate</del> adverse effects from the use and development of surface water resources on:</p> <ul style="list-style-type: none"> <li><del>(a) the quality and quantity of aquatic habitat;</del></li> <li><del>(b) natural character values, natural features, and amenity, aesthetic and landscape values;</del></li> <li>(c) areas of significant indigenous vegetation and significant habitats of indigenous fauna;</li> <li><del>(d) recreational values;</del></li> <li>(e) the spiritual and cultural values and beliefs of tangata whenua;</li> <li>(f) water quality, including temperature and oxygen content;</li> <li><del>(g) the rights of lawful existing users;</del></li> <li>(h) groundwater quality and quantity;</li> <li><del>(i) historic heritage values;</del></li> <li>(j) mātaítai, taiāpure and nohoanga;</li> </ul> <p>Add new policy:</p> <p>1. avoid, remedy or mitigate adverse effects from the use and development of surface water resources on:</p> <ul style="list-style-type: none"> <li>(a) the quality and quantity of aquatic habitat;</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(b) natural character values, natural features, and amenity, aesthetic and landscape values;  <del>(c) areas of significant indigenous vegetation and significant habitats of indigenous fauna;</del>            (d) recreational values;  <del>(e) the spiritual and cultural values and beliefs of tangata whenua;</del>            (f) water quality, including temperature and oxygen content;  <del>(g) the rights of lawful existing users;</del>  <del>(h) groundwater quality and quantity;</del>            (i) historic heritage values;  <del>(j) mātaītai, taiāpure and nohoanga;</del></p> <p>Amend Policy 20(2) as follows:            avoid, <del>remedy or mitigate significant</del> adverse effects from the use and development of groundwater resources:            (a) long-term aquifer storage volumes;            (b) the reliability of supply for existing groundwater users;</p> <p>Amend Policy 20(4) as follows:4. recognise the positive <u>and adverse</u> effects resulting from the use and development of water resources.</p>
341.3	Gunton Farms Ltd (Jeremy Gunton)	Policy 20	Support	Retain Policy 20(1)(2)(3)(4).
372.4	Heritage NZ	Policy 20	Support	Retain.
390.14	Horticulture NZ	Policy 20	Support in part	Amend Policy 20 1) c) to ‘recreational uses’ And Add to Policy 20 1) g) the rights and reliability of supply for lawful existing users. And Retain Policy 20 2) b). And Retain Policy 20 3).
410.3	Invercargill Airport Ltd	Policy 20	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
414.4	Irrigation NZ Incorporated	Policy 20		<u>1(c) the spiritual and cultural values and beliefs of tangata whenua</u>
437.13	KEMPTHORNE Robert	Policy 20	Oppose in part	Removal of all spiritual references and English translations should be available for all Maori words. Delete or amend (e). Oppose (j) as there is no definition or explanation as to what all of these words mean.
449.8	KiwiRail Holdings Ltd (KiwiRail)	Policy 20	Amend	Amend as follows: Policy 20 – Management of water resources. Manage the taking, abstraction, use, damming or diversion of surface water and groundwater so as to: 1. Avoid, remedy or mitigate adverse effects from the use and development of surface water resources on: (a) the quality and quantity of aquatic habitat; (b) natural character values, natural features and amenity, aesthetic and landscape values; (c) areas of significant indigenous vegetation and significant habitats of indigenous fauna; (d) recreational values; (e) the spiritual and cultural values and beliefs of tangata whenua; (f) water quality, including temperature and oxygen content; (g) the rights of lawful existing users; (h) groundwater quality and quantity; (i) <del>historic heritage values</del> ; (j) mataitai, taiapure and nohoanga;
464.7	Landpro Ltd	Policy 20	Support in part	Provide greater clarity around what level of effects are considered to be acceptable.
611.4	NZ Defence Force	Policy 20	Support	Retain.
749.49	Southland Conservation Board	Policy 20	Support	Retain.
752.63	Southland Fish & Game Council	Policy 20	Support Amend	Retain Policy 20 as notified and amend Policy 20 to provide: <b>“Policy 20 – Management of water resources</b> Manage the taking, abstraction, use, damming or diversion of surface water and groundwater by <u>developing environmental flows and groundwater levels allocation regimes</u> so as to: 1. Avoid, remedy or mitigate adverse effects from the use and development of surface water resources on:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(a) The quality and quantity of aquatic habitat, <u>including protecting the life supporting capacity and ecosystem health and processes of waterbodies.</u></p> <p>(b) Natural character values, natural features, and amenity, aesthetic and landscape values, <u>which includes:</u></p> <ul style="list-style-type: none"> <li>i. <u>Natural elements, processes and patterns;</u></li> <li>ii. <u>Biophysical, ecological, geological, geomorphological and morphological aspects;</u> <u>and</u></li> <li>iii. <u>The natural movement of water and sediment including hydrological and fluvial processes;</u></li> </ul> <p>And</p> <p>Retain Policy 20(1)(c) - (j).</p> <p>And</p> <p>Amend Policy 20(2) to provide:</p> <p>“2. <del>Avoid, remedy or mitigate</del> significant adverse effects from the use and development of groundwater resources.”</p> <p>And</p> <p>Retain Policy 20(2)(a), (b) and (d).</p> <p>And</p> <p>Amend Policy 20(c) to provide:</p> <p>“(c) surface water flows and levels, particularly in spring-fed creeks, <u>natural wetlands and lakes, to protect and aquatic ecosystems and habitats, including life supporting capacity and ecosystem health and processes of waterbodies, and their natural character;</u> and”</p> <p>And</p> <p>Amend Policy 20(3) to ensure that water takes and uses of water are first necessary, second reasonable for the intended end use, and where they are both necessary and reasonable are used efficiently.</p> <p>And</p> <p>Insert the following numbered bullet points:</p> <p>“4. <u>Maintain groundwater quality where it has not been degraded by land use and discharge activities.</u></p> <p>5. <u>Where groundwater quality has been degraded by land use and discharge activities reduce</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>nutrient losses to groundwater through management of irrigation.</u></p> <p>6. In times of water shortage, takes are restricted to those that are essential to the health or safety of people, and communities, or for drinking water for animals and all other takes are ceased.”</p> <p>And</p> <p>Amend Policy 20(4) to recognise the positive and <u>adverse effects</u> arising from the use and development of water resources.</p>
832.35	VAN GOOL Raewyn	Policy 20	Support	Retain.
877.24	WILSON Aaron	Policy 20	Support	Retain.
880.30	WILSON Shannon	Policy 20	Support	Retain.
895.28	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 20	Support	Retain.

#### Policy 21 – Allocation of water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.40	Aratiatia Livestock Ltd	Policy 21	Support	Retain.
94.2	Brooklea Farm Ltd	Policy 21	Oppose Support	Support the total removal of increased cut-offs. Existing cut-offs are already in place through our consent and until the council can prove first, the extent of the aquifer and the scientific data to support cut-offs, it should be excluded.
108.38	BYTHELL Jesse	Policy 21	Support	Retain.
120.2	CARTER D G & B J	Policy 21	Support	Retain.
189.17	Dairy Holdings Ltd	Policy 21		<p>Amend Policy 21(2)(a) as follows:</p> <p>determining that a waterbody is fully allocated when the total volume of water allocated through current resource consents (<u>including current resource consents that have not yet been implemented</u>) and permitted activities is equal to either:...</p> <p>Amend Policy (21)(3)(b)as follows:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				the reliability of supply for existing groundwater users ( <u>including those with existing resource consents for groundwater take that have not yet been implemented</u> ) is not adversely affected.
210.59	Director-General of Conservation	Policy 21	Oppose in part	Amend Policy 21(3) to read; . 3. enabling secondary allocation of surface water <del>and groundwater</del> <u>subject to appropriate environmental flow surface water allocation regime and taking into account minimum lake and wetland water levels</u> and groundwater level cutoffs and/or seasonal recovery triggers, to ensure: (a) long-term aquifer storage volumes are maintained; and (b) the reliability of supply for existing groundwater users is not adversely affected. <u>(c) the health of the surface water bodies are maintained and where degraded enhanced.</u>
265.51	Federated Farmers of NZ (Southland Province)	Policy 21	Oppose	Delete.
277.28	Fonterra Co-operative Group Ltd	Policy 21	Support in part	Amend Policy 21 so as to read: Policy 21 – Allocation of water Manage the allocation of surface water and groundwater by: ... <u>4. when considering levels of abstraction, recognise the need to exclude takes for non-consumptive uses that return the same amount (or more) water to the same waterbody in an appropriate manner.”</u>
279.28	Forest & Bird NZ	Policy 21	Support	Retain.
381.10	HOLDER Wendy & Tom	Policy 21		Add a (c) to Policy 21(2) - revoke consents for over allocation and provide consent as per Appendix L. calculation. Insert into 3(b) reduce supply where over allocated.
390.15	Horticulture NZ	Policy 21	Oppose in part	Amend Policy 21 as follows: <u>Efficient</u> allocation of water Manage the allocation of surface water and ground water <u>to ensure efficient allocation</u> by:
410.4	Invercargill Airport Ltd	Policy 21		Policies in the Proposed Plan which relate to the abstraction and use of water (i.e. Policy 20) should also ensure that activities are not undertaken in such a way that compromises the safe operation and efficient use of existing physical resources and infrastructure.
480.2	Lowburn Ag Ltd (Jonathan Pemberton)	Policy 21	Support	Retain.
749.50	Southland Conservation Board	Policy 21	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.64	Southland Fish & Game Council	Policy 21	Oppose in part	<p>Retain Policy 21 as notified and make the following amendment to the introductory sentence to Policy 21</p> <p><b>“Allocation of water</b></p> <p><u>Water from a surface water body will not be over allocated through the resource consent process. Manage the allocation of surface and groundwater by:”</u></p> <p>And</p> <p>Amend Policy 21(3) to provide:</p> <p>“3. Enabling secondary allocation of surface water <del>and groundwater</del> subject to appropriate <u>surface water environmental flow regimes, minimum lake and wetland water levels,</u> minimum groundwater cut-offs and / or seasonal recovery triggers, to ensure:</p> <ul style="list-style-type: none"> <li>(a) Long-term aquifer storage volumes are maintained; <del>and</del></li> <li>(b) The reliability of supply for existing groundwater users is not adversely affected; <del>and</del></li> <li>(c) <u>The life supporting capacity of rivers, lakes and wetlands and their natural character are protected.</u></li> </ul> <p>Include new numbered bullet point:</p> <p><u>“4. Consent will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased. Over allocation of water shall be addressed during the FMU process or sooner during the resource consenting process.”</u></p> <p>Include a schedule illustrating where:</p> <ol style="list-style-type: none"> <li>1. Water quantity over allocation exists;</li> <li>2. Potential water quantity over allocation exists; and</li> <li>3. Water quantity is constrained by existing allocation of surface water and groundwater.</li> </ol>
832.36	VAN GOOL Raewyn	Policy 21	Support	Retain.
877.25	WILSON Aaron	Policy 21	Support	Retain.
880.31	WILSON Shannon	Policy 21	Support	Retain.
895.29	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 21	Amend	<p>Amend Policy 21 to provide policy support for abstraction for temporary construction dewatering activities, including where aquifers are over allocated, to recognise that dewatering can help safely facilitate essential maintenance activities such as the replacement of underground storage tanks. This could be achieved by making the following amendments:</p> <p><b>Policy 21 – Allocation of water</b></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Manage the allocation of surface water and groundwater by:</p> <ol style="list-style-type: none"> <li>1. determining the primary allocation for confined aquifers not identified in Appendix L.5, following the methodology established in Appendix L.6;</li> <li>2. determining that a waterbody is fully allocated when the total volume of water allocated through current resource consents and permitted activities is equal to either: <ol style="list-style-type: none"> <li>(a) the maximum amount that may be allocated under the rules of this Plan, or</li> <li>(b) the provisions of any water conservation order;</li> </ol> </li> <li>3. enabling secondary allocation of surface water and groundwater subject to appropriate minimum groundwater level cutoffs and/or seasonal recovery triggers, to ensure: <ol style="list-style-type: none"> <li>(a) long-term aquifer storage volumes are maintained; and</li> <li>(b) the reliability of supply for existing groundwater users is not adversely affected.</li> </ol> </li> <li>4. <u>enabling abstraction for temporary construction dewatering activities where water taken is returned to the aquifer or a connected surface water body, including discharges returned to the catchment via the reticulated stormwater network.</u></li> </ol>

**Policy 22 – Management of the effects of groundwater and surface water use**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.41	Aratiatia Livestock Ltd	Policy 22	Support	Retain.
108.39	BYTHELL Jesse	Policy 22	Support	Retain.
189.18	Dairy Holdings Ltd	Policy 22		Amend 22(3)(b) as follows: assess and manage the effects of groundwater abstractions with a daily volume exceeding 86 cubic metres per day <u>(not including water taken under s14(3)(b) of the Resource Management Act 1991)</u> in groundwater management zones other than those specified in Appendix L.5.
210.60	Director-General of Conservation	Policy 22	Support in part.	Retain Policy 22 as notified if long term base flows mean the Q95 flow as outlined in Appendix K. If the long term base flow is less than the Q95 flow then this policy is opposed and it should be deleted.
277.29	Fonterra Co-operative Group Ltd	Policy 22	Oppose in part	Amend Policy 22 so as to read: “Policy 22 – Management of the effects of groundwater and surface water use Manage the effects of surface and groundwater abstractions by:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>1. avoiding allocating water to the extent that the <u>effects on surface water flow would not safeguard</u> base flow of any waterway is depleted, in order to protect the mauri of that waterway and mahinga kai or taonga species;</p> <p>2. ensuring interference effects are acceptable, in accordance with Appendix L.3;”</p> <p>...</p>
279.29	Forest & Bird NZ	Policy 22	Support with minor amendment	Amend Policy 22 as follows: avoiding allocating water to the extent that the base flow of any waterway is depleted, <u>in order to safe guard it'slife supporting capacity</u> , protect the mauri of that waterway and mahinga kai or taonga species and freshwater fish;
410.5	Invercargill Airport Ltd	Policy 22		<p>Policies in the Proposed Plan which relate to the abstraction and use of water (i.e. Policy 20) should also ensure that activities are not undertaken in such a way that compromises the safe operation and efficient use of existing physical resources and infrastructure.</p> <p>“If “base flow” does not mean Q95 then Policy 22 is opposed and Fish &amp; Game seeks that it is deleted in its entirety”.</p>
464.8	Landpro Ltd	Policy 22	Oppose in part	The policy should be amended to remove the requirement to have no effects on base flow.
480.3	Lowburn Ag Ltd (Jonathan Pemberton)	Policy 22	Support	Retain.
622.12	P F Olsen Ltd	Policy 22	Amend	Include a new policy covering allocation of contaminants and linking it to the high level principles of financial transfer mechanisms within a ‘Natural Capital’ framework as already discussed.
749.51	Southland Conservation Board	Policy 22	Support	Retain.
752.65	Southland Fish & Game Council	Policy 22	Support Amend	If “base flow” means Q95 retain Policy 22 as notified and amend Policy 22(1) to provide; “. . . the mauri of that waterway, <del>and</del> mahinga kai or taonga species <u>and trout and salmon.</u> ”
811.13	THYS Herman & STAUT Tinneke	Policy 22	Support	Retain.
832.37	VAN GOOL Raewyn	Policy 22	Support	Retain.
877.26	WILSON Aaron	Policy 22	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.32	WILSON Shannon	Policy 22	Support	Retain.
895.30	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 22	Support	Retain.

### Policy 23 – Stream depletion effects

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.12	ADAMS A J & P G	Policy 23	Amend	There should be different rules for different classes of stock or have an effects based plan instead of risk based. The 50 hectare limit should be the minimum and larger properties should be based on a percentage of the total area of the property. Buffers need to be based on effects not risks. Scrap requirement to map drains and work on effects based plan. There should be different definitions for farms who take on extra stock for winter grazing, and farms who graze their own capital stock.
24.42	Aratiatia Livestock Ltd	Policy 23	Support	Retain.
47.7	Balfour, Wendonside & Waikaia Group	Policy 23	Support in part	Retain.
108.40	BYTHELL Jesse	Policy 23	Support	Retain.
172.10	COWAN Les & Christine	Policy 23	Amend	Delete.
277.30	Fonterra Co-operative Group Ltd	Policy 23	Oppose in part	<p>Reword Policy 23 as follows:</p> <p>“Manage stream depletion effects resulting from groundwater takes with a daily average rate of take exceeding 2 litres per second <u>based on their classification in Appendix L2, which are classified as having a Riparian, Direct, High or Moderate hydraulic connection, as set out in Appendix L2,</u> to ensure the cumulative-effect take does not:</p> <ol style="list-style-type: none"> <li>1. exceed any relevant surface water allocation regime (including those established under any water conservation order) <u>for groundwater takes classified as Riparian, Direct, High or Moderate hydraulic connection;</u></li> </ol> <p>result in <u>abstraction occurring during times when surface water flows or levels are less than prescribed minimum flows or levels or long-term baseflow for groundwater takes classified as Riparian, Direct or High hydraulic connection.</u>”</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.30	Forest & Bird NZ	Policy 23	Support	Retain.
410.6	Invercargill Airport Ltd	Policy 23		Policies in the Proposed Plan which relate to the abstraction and use of water (i.e. Policy 20) should also ensure that activities are not undertaken in such a way that compromises the safe operation and efficient use of existing physical resources and infrastructure.
464.9	Landpro Ltd	Policy 23	Support Amend	Amend the policy to define how groundwater takes with a moderate degree of hydraulic connection will be assessed against the Maitara Conversation Order and existing user's reliability of supply.
749.52	Southland Conservation Board	Policy 23	Support	Retain.
752.66	Southland Fish & Game Council	Policy 23	Support Amend	If "base flow" does not mean Q95 then Policy 23(2) is amended to provide:  "2. Results in surface water flows or levels less than the prescribed minimum flows <del>or levels or long term base flows.</del> "
759.7	Springlands Group Ltd	Policy 23	Support	Retain.
832.38	VAN GOOL Raewyn	Policy 23	Support	Retain.
877.27	WILSON Aaron	Policy 23	Support	Retain.
880.33	WILSON Shannon	Policy 23	Support	Retain.
895.31	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 23	Support	Retain.

#### Policy 24 – Water abstraction for community water supply

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.43	Aratiatia Livestock Ltd	Policy 24	Support	Retain.
108.41	BYTHELL Jesse	Policy 24	Support	Retain.
279.31	Forest & Bird NZ	Policy 24	Support	Retain.
330.6	Gore District Council,	Policy 24	Oppose	Policy 24 is amended to:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Invercargill City Council and Southland District Council		Amend	<ol style="list-style-type: none"> <li>1. Clarify how this policy will relate to community supply where the catchment is over allocated.</li> <li>2. Clarify the 'scale of activity' and the expectations around the scale and detail of the water demand strategy document.</li> </ol>
372.5	Heritage NZ	Policy 24	Support	Retain.
410.7	Invercargill Airport Ltd	Policy 24		Policies in the Proposed Plan which relate to the abstraction and use of water (i.e. Policy 20) should also ensure that activities are not undertaken in such a way that compromises the safe operation and efficient use of existing physical resources and infrastructure.
664.15	Real Journeys Ltd	Policy 24		Provide for water abstraction for intermediate size activities. That is activities between households and community water supplies.
749.53	Southland Conservation Board	Policy 24	Support	Retain.
750.5	Southland District Council	Policy 24	Support in part	<p>Clarify how the policy would be applied to new community water supplies in catchments where the water has been over allocated.</p> <p>Further guidance around defining the 'scale of the activity' and therefore the expectations around the scale and detail of the water demand strategy document.</p>
752.67	Southland Fish & Game Council	Policy 24	Support Amend	<p>Retain Policy 24 as notified and amend Policy 24(1) to provide:</p> <p>"1. Provided that significant adverse effects on the following are avoided as first preference, and if unable to be avoided, are mitigated <u>or remedied</u>:</p> <ol style="list-style-type: none"> <li>(a) The quality and quantity of aquatic habitat, <u>including protecting the life supporting capacity and ecosystem health and processes of waterbodies.</u></li> <li>(b) Natural character values, natural features, and amenity, aesthetic and landscape values, <u>which includes:</u> <ol style="list-style-type: none"> <li>i. <u>Natural elements, processes and patterns;</u></li> <li>ii. <u>Biophysical, ecological, geological, geomorphological and morphological aspects;</u> <u>and</u></li> <li>iii. <u>The natural movement of water and sediment including hydrological and fluvial processes;</u></li> </ol> </li> </ol>
832.39	VAN GOOL Raewyn	Policy 24	Support	Retain.
877.28	WILSON Aaron	Policy 24	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.34	WILSON Shannon	Policy 24	Support	Retain.

### Policy 25 – Priority takes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.22	Alliance Group Ltd	Policy 25	Support in part	Amend the policy as follows: When issuing a water shortage direction, Environment Southland will give priority to water abstraction for the following uses: <ol style="list-style-type: none"> <li>1. Reasonable domestic needs;</li> <li>2. Reasonable animal drinking needs;</li> <li>3. Fire-fighting purposes;</li> <li>4. Public health needs; or</li> <li>5. <u>Stock processing for</u> animal welfare needs.</li> </ol>
24.44	Aratiatia Livestock Ltd	Policy 25	Support	Please define each of these categories. For example “reasonable”. If the drinking needs of an animal are not met, such deprivation rapidly becomes an animal welfare issue.
25.12	Ardel Dairies Ltd	Policy 25	Support	Retain.
89.16	BRENTLEIGH Family Trust	Policy 25	Support	Retain.
108.42	BYTHELL Jesse	Policy 25	Support	Retain.
189.19	Dairy Holdings Ltd	Policy 25		Amend Policy 25(6) as follows: animal welfare needs ( <u>including the cooling water and dairy shed water needed to facilitate milking</u> ).
205.11	Dillon Ag Ltd (Chris Dillon)	Policy 25	Support	Retain.
206.11	Dillon Ag Ltd (Rochelle Dillon)	Policy 25	Support	Retain.
209.16	DIPROSE Dave	Policy 25	Support	Retain.
265.52	Federated Farmers of NZ (Southland Province)	Policy 25	Support in part	Amend Policy 25 as follows and reorder so that it immediately follows Policy B7. <del>When issuing a water shortage direction,</del> Environment Southland will give priority to water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				abstraction for the following uses: 1. reasonable domestic needs; 2. reasonable animal drinking needs; 3. fire-fighting purposes; 4. public health needs; <del>or</del> and 6. animal welfare needs.
277.31	Fonterra Co-operative Group Ltd	Policy 25	Oppose in part	Amend Policy 25 by adding the following clause: “Policy 25 – Priority takes When issuing a water shortage direction, Environment Southland will give priority to water abstraction for the following uses: 1. reasonable domestic needs; 2. reasonable animal drinking needs; 3. fire-fighting purposes; 4. public health needs; or [5]6. animal welfare needs.; [6] <u>non-consumptive uses; or</u> [7] <u>industries that process perishable foods.”</u>
279.32	Forest & Bird NZ	Policy 25	Oppose	Support with minor amendment to give effect to Objective B1 NPSFM.
330.7	Gore District Council, Invercargill City Council and Southland District Council	Policy 25	Oppose Amend	Policy 25 is amended as follows: <b>Policy 25 – Priority takes</b> When issuing a water shortage direction, Environment Southland will give priority to water abstraction for the following uses: 1. reasonable domestic needs, <u>including for community supply;</u> 2. reasonable animal drinking needs; 3. fire-fighting purposes; 4. public health needs; or 5. animal welfare needs.
381.11	HOLDER Wendy & Tom	Policy 25		Propose change to Priority Listing. 1. Reasonable domestic needs 2. Public health needs 3. Firefighting purposes 4. Reasonable animal drinking needs



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				5. Animal welfare and business welfare needs.
390.16	Horticulture NZ	Policy 25	Support in part	Clarify that 'reasonable domestic needs' will be specific in water demand management strategies and will be the basis of water allocation under water shortage directions.
410.8	Invercargill Airport Ltd	Policy 25		Policies in the Proposed Plan which relate to the abstraction and use of water (i.e. Policy 20) should also ensure that activities are not undertaken in such a way that compromises the safe operation and efficient use of existing physical resources and infrastructure.
414.5	Irrigation NZ Incorporated	Policy 25		Delete 4 and 6.
464.10	Landpro Ltd	Policy 25	Support Amend	We seek that this policy is amended to include existing water takes.
611.5	NZ Defence Force	Policy 25	Amend	NZDF requests that temporary military training activities be added to the list of priorities in Policy 25.
612.1	NZ Fire Service Commission	Policy 25	Amend	Amend Policy 25 as follows by adding: When issuing a water shortage direction, Environment Southland will give priority to water abstraction for the following uses: 1. Reasonable domestic needs; 2. Reasonable animal drinking needs; 3. Fire-fighting purposes, <u>including reasonable fire-fighting training needs</u> ; 4. Public health needs; or 5. Animal welfare needs
704.3	Ryan Farms 2006 Ltd	Policy 25	Oppose	Clarification of 'outer edge of bed'. Controlling Noxious weeds should be top priority. We think 25 degrees would be more suitable.
749.54	Southland Conservation Board	Policy 25	Amend	Re-word the Policy to include: <u>(6) supporting communities of significant indigenous biodiversity.</u>
752.68	Southland Fish & Game Council	Policy 25	Support	Retain.
802.11	The 254 Partnership & Gerken Family Trust	Policy 25	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
832.40	VAN GOOL Raewyn	Policy 25	Support	Retain.
877.29	WILSON Aaron	Policy 25	Support	Retain.
880.35	WILSON Shannon	Policy 25	Support	Retain.

### Policy 26 – Renewable energy

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.45	Aratiatia Livestock Ltd	Policy 26	Support	We would like Council's policy to include: (3) Subject avoid remedying or mitigating any adverse effects on the mauri of the river system.
25.13	Ardel Dairies Ltd	Policy 26	Support	Retain.
89.17	BRENTLEIGH Family Trust	Policy 26	Support	Retain.
108.43	BYTHELL Jesse	Policy 26	Support	Retain.
205.12	Dillon Ag Ltd (Chris Dillon)	Policy 26	Support	Retain.
206.12	Dillon Ag Ltd (Rochelle Dillon)	Policy 26	Support	Retain.
249.14	Ernslaw One Ltd	Policy 26	Support	When implementing market mechanisms (pricing) for water, Council should ensure that hydro-electric generators are not be classed as abstractive users nor as dischargers, as any cost incurred would be passed through to electricity consumers, Pricing water for hydro could create the perverse outcome of incentivising fossil fuel based generation (incl. thermal generation from coal seam methane & fracking) ahead of hydro [see submission points under Objectives 6, 7 and 11].
265.53	Federated Farmers of NZ (Southland Province)	Policy 26	Oppose	Delete.
279.33	Forest & Bird NZ	Policy 26	Support	Retain.
437.14	KEMPTHORNE Robert	Policy 26	Oppose in	Amend this Policy to ensure that:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	Proper due consideration of a consumptive resource consent applications in this catchment for the more efficient and economic use of the surface fresh water to be considered regardless of the previously legislated full allocation to Meridian Energy. As per Objectives 9, 10 and 11.
562.6	Meridian Energy Ltd	Policy 26	Oppose in part	Amend Policy 26 to read: Policy 26– Renewable energy Recognise and provide for the national and regional significance of renewable electricity generation activities (including the existing Manapouri hydro-electric facilities in the Waiiau catchment), and the national, regional and local benefits relevant to renewable electricity generation activities, <u>the need to locate the activity where the renewable energy resource is available and the practical constraints associated with its development, operation, maintenance and upgrading</u> , when: 1) allocating surface water for abstraction, damming, diversion and use; and 2) considering all resource consent applications for surface water abstractions, damming, diversion and use <u>and</u> . 3) <u>Considering uses of land, use of the beds of lakes and rivers and discharge of contaminants or water to water or land for, or which may impact on, renewable electricity generation activities.</u>
664.16	Real Journeys Ltd	Policy 26		Provide for micro-hydro or smaller scale electric power generation in remote locations.
731.5	SMITH Barry	Policy 26		Provision should be encouraged within the plan to use other methods of renewable energy such as photovoltaic and smaller local wind generation.
768.8	STEVENSON Audrey	Policy 26	Oppose	Amend to provide for farmers and community needs for water in the future.
802.12	The 254 Partnership & Gerken Family Trust	Policy 26	Support	Retain.
832.41	VAN GOOL Raewyn	Policy 26	Support	Retain.

### Policy 27 – Bore construction and management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.46	Aratiatia Livestock Ltd	Policy 27	Support	Retain.
25.14	Ardel Dairies Ltd	Policy 27	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.18	BRENTLEIGH Family Trust	Policy 27	Support	Retain.
108.44	BYTHELL Jesse	Policy 27	Support	Retain.
205.13	Dillon Ag Ltd (Chris Dillon)	Policy 27	Support	Retain.
206.13	Dillon Ag Ltd (Rochelle Dillon)	Policy 27	Support	Retain.
802.13	The 254 Partnership & Gerken Family Trust	Policy 27	Support	Retain.
832.42	VAN GOOL Raewyn	Policy 27	Support	Retain.
895.32	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 27	Support	Retain.

**Policy 28 – Structures and bed disturbance activities of rivers (including streams and modified watercourses) and lakes**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.47	Aratiatia Livestock Ltd	Policy 28	Support	Retain.
25.15	Ardel Dairies Ltd	Policy 28	Support	Retain.
89.19	BRENTLEIGH Family Trust	Policy 28	Support	Retain.
108.45	BYTHELL Jesse	Policy 28	Support	Retain.
205.14	Dillon Ag Ltd (Chris Dillon)	Policy 28	Support	Retain.
206.14	Dillon Ag Ltd (Rochelle Dillon)	Policy 28	Support	Retain.
210.61	Director-General of	Policy 28	Support in	Retain Policy 28 as notified and include <u>landscape values</u> .

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Conservation		part.	
265.54	Federated Farmers of NZ (Southland Province)	Policy 28	Oppose in part	Delete Policy 28(4) and (5).
277.32	Fonterra Co-operative Group Ltd	Policy 28	Support	Retain.
279.34	Forest & Bird NZ	Policy 28	Support with minor amendment	Amend Policy 28 as follows: Manage structures and bed disturbance activities in the beds of rivers and lakes, to <del>avoid, remedy or mitigate adverse effects on:</del> <u>maintain or improve</u> 1. water quality and quantity; 2. habitats, ecosystems and fish passage; 3. indigenous biological diversity; 4. historic heritage; 5. the spiritual and cultural values and beliefs of the tangata whenua; 6. mātaihai and taiāpure; 7. public access (except in circumstances where public health and safety are at risk) and amenity values; <del>8. natural character values and outstanding natural features;</del> 9. river morphology and dynamics, including erosion and sedimentation; 10. flood risk; 11. infrastructural assets; and 12. navigational safety.
372.6	Heritage NZ	Policy 28	Support	Retain.
449.9	KiwiRail Holdings Ltd (KiwiRail)	Policy 28	Support	Amend as follows: Policy 28 – Structures and bed disturbance activities of rivers (including streams and modified watercourses) and lakes Manage structures and bed disturbance activities in the beds of rivers and lakes, to avoid, remedy or mitigate adverse effects on: 1. water quality and quantity; 2. habitats, ecosystems and fish passage; 3. indigenous biological diversity;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>4. historic heritage;</li> <li>5. the spiritual and cultural values and beliefs of the tangata whenua;</li> <li>6. mātaītai and taiāpure;</li> <li>7. public access (except in circumstances where public health and safety are at risk) and amenity values;</li> <li>8. natural character values and outstanding natural features;</li> <li>9. river morphology and dynamics, including erosion and sedimentation;</li> <li>10. flood risk;</li> <li>11. infrastructural assets; and</li> <li>12. navigational safety.</li> </ul>
523.1	MCGREGOR Grant Wreys Bush Concrete	Policy 28	Support	Retain.
562.7	Meridian Energy Ltd	Policy 28	Oppose in part	<p><b>Amend</b> Policy 28 to read:</p> <p>Policy 28 – Structures and bed disturbance activities of rivers (including streams and modified watercourses) and lakes</p> <p>Manage structures, <del>and</del> bed disturbance activities <u>and associated discharges</u> in the beds of rivers and lakes, to avoid, remedy or mitigate adverse effects on:</p> <ul style="list-style-type: none"> <li>1) water quality and quantity;</li> <li>2) habitats, ecosystems and fish passage;</li> <li>3) indigenous biological diversity;</li> <li>4) historic heritage,</li> <li>5) the spiritual and cultural values and beliefs of the tangata whenua;</li> <li>6) mataītai and taiāpure;</li> <li>7) public access (except in circumstances where public health and safety are at risk) and amenity values;</li> <li>8) natural character values and outstanding natural features;</li> <li>9) river morphology and dynamics, including erosion and sedimentation;</li> <li>10) flood risk;</li> <li>11) infrastructural assets; and</li> <li>12) navigational safety.</li> </ul>
611.6	NZ Defence Force	Policy 28		Retain.
614.4	NZ Transport Agency	Policy 28	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
749.55	Southland Conservation Board	Policy 28	Support	Retain.
752.69	Southland Fish & Game Council	Policy 28	Support Amend	Retain Policy 28 as notified and amend it to provide: “Manage structures and bed disturbance activities in the beds of rivers and lakes <u>and their margins</u> , to avoid, remedy or mitigate adverse effects on: ... 7. Public access ( <del>except in circumstances where public health and safety are at risk</del> ) and amenity values; 8. <u>Landscape values</u> , natural character values and outstanding natural features.” And Insert new numbered bullet point: “ <u>12. Navigational safety.</u> ”
753.1	Southland River Liaison Committees	Policy 28	Support	Retain.
792.9	TAYLER Matthew	Policy 28	Support in part Amend	A rule/mechanism needs to be introduced to allow landowners the means to maintain a waterway as long as GMP’s are observed. Hopefully this would be via the Farm environmental plan but may need to be in the form of a restricted discretionary consent that the council would, via their land sustainability officers, assist landowners to obtain and forfeit any consent fees due. This consent would be granted for say a 15 year term and allow the landowner to carry out reasonable works, such as removal/spray of weeds, use of rock rip rap and bank battering where erosion is occurring, removal of gravel as it aggregates altering channel course, vegetation planting.
802.14	The 254 Partnership & Gerken Family Trust	Policy 28	Support	Retain.
811.14	THYS Herman & STAUT Tinneke	Policy 28	Support	Retain.
832.43	VAN GOOL Raewyn	Policy 28	Support	Retain.

**Policy 29 – Provide for the extraction of gravel**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
10.1	Aggregate & Quarry Association of NZ	Policy 29	Support in part	Amend Policy 29 as follows: Provide for the extraction of gravel to meet the <u>social, economic and development</u> needs of the community, in a way that avoids, remedies or mitigates adverse effects on rivers and their margins; and: <ol style="list-style-type: none"> <li>1. maintains or enhances aquatic and riparian habitat; or</li> <li>2. ensures no long-term net loss of habitat in the river channel and floodplain; or</li> <li>3. maintains or enhances flood protection, erosion control or the integrity of physical resources; and</li> <li>4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mātaítai and taiāpure; and</li> <li>5. does not adversely affect recreational values.</li> </ol>
22.1	Aparima Bridge Farm	Policy 29	Support	Retain.
24.48	Aratiatia Livestock Ltd	Policy 29	Support	Retain.
25.16	Ardel Dairies Ltd	Policy 29	Support	Retain.
47.8	Balfour, Wendonside & Waikaia Group	Policy 29	Support in part	Retain.
80.14	BLAKELY Barney & Stephanie	Policy 29	Support	Retain.
81.16	BLAKELY Hamish & Hannah	Policy 29	Support	Digging holes beside rivers should be illegal. Removing alluvial deposits (beach skimming) gravel should be permitted and encouraged.
89.20	BRENTLEIGH Family Trust	Policy 29	Support	Retain.
145.2	CLELAND JA & DM & SJ Partnership	Policy 29	Oppose	Amend Policy 29 to make it easier for extraction of gravel beaches from river.
205.15	Dillon Ag Ltd (Chris Dillon)	Policy 29	Support	Retain.
206.15	Dillon Ag Ltd (Rochelle Dillon)	Policy 29	Support	Retain.
207.2	Dillon Grain Ltd	Policy 29	Support	Allow for increased extraction limits.
209.17	DIPROSE Dave	Policy 29	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.62	Director-General of Conservation	Policy 29	Support in part	Amend Policy 29 to read: <u>Policy 29 – Provide for the extraction of gravel</u> Provide for the extraction of gravel to meet the needs of the community, in a way that avoids, remedies or mitigates adverse effects on rivers and their margins; and: 1. maintains or enhances aquatic, <u>braided river bird habitat in particular bare gravel bars</u> and riparian habitat; or 2. ensures no long-term net loss of habitat in the river channel, <u>bed</u> and floodplain; or 3. maintains or enhances flood protection, erosion control or the integrity of physical resources; and 4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mātaītai and taiāpure; and 5. does not adversely affect recreational values.
220.9	Drylands Farming Ltd	Policy 29	Support Amend	Land owners affected by floods directly from rivers and streams, should have more say in how much and where gravel can be extracted from.
221.9	DRYSDALE Family Trust	Policy 29	Support Amend	Land owners affected by floods directly from rivers and streams, should have more say in how much and where gravel can be extracted from.
279.35	Forest & Bird NZ	Policy 29		Amend Policy 29 as follows: Provide for the extraction of gravel to meet the needs of the community, in a way that <del>avoids, remedies or mitigates adverse effects on rivers and their margins; and:</del> 1. maintains or enhances aquatic and riparian habitat; <del>or and</del> 2. ensures no <del>long-term</del> net loss of habitat in the river channel and floodplain; <del>or and</del> 3. maintains or enhances flood protection, erosion control <del>or</del> and the integrity of physical resources; and 4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mātaītai and taiāp 5. does not adversely affect recreational values. <u>6 does not adversely affect the habitat of threatened indigenous species</u> <u>7. Preserves the natural character of rivers and their margins</u> <u>8 Protects areas of significant indigenous vegetation and habitats of indigenous species</u> <u>9 Maintains public access</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
288.22	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 29	Support in part	<p>Retain policy 29 with amendments to recognize the value of gravel extraction, remove specific restrictions and to widen the application of the policy to include land based extraction:</p> <p>Policy 29 – Provide for the extraction of gravel  <u>Recognise the value of gravel extraction for construction and maintenance of infrastructure, for economic activity and for flood management purposes and</u> Provide for the extraction of gravel to meet the needs of the community, in a way that avoids, remedies or mitigates adverse effects on rivers and their margins <u>and groundwater quality;</u> <del>and</del></p> <ol style="list-style-type: none"> <li><del>1. maintains or enhances aquatic and riparian habitat; or</del></li> <li><del>2. ensures no long-term net loss of habitat in the river channel and floodplain; or</del></li> <li><del>3. maintains or enhances flood protection, erosion control or the integrity of physical resources; and</del></li> <li><del>4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mātaimai and taiāpure; and</del></li> <li><del>5. does not adversely affect recreational values</del></li> </ol>
342.5	H W Richardson Group	Policy 29	Oppose in part	<p>Amend the policy as follows:</p> <p>Provide for the extraction of gravel to meet the needs of the community, in a way that avoids, remedies or mitigates adverse effects on:</p> <ol style="list-style-type: none"> <li><del>1. on rivers and their margins; and</del></li> <li><del>2. maintains or enhances aquatic and riparian habitat; or</del></li> <li><del>2. ensures no long-term net loss of habitat in the river channel and floodplain; or</del></li> <li><del>3. maintains or enhances flood protection, erosion control or the integrity of physical resources; and</del></li> <li><del>4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mātaimai and taiāpure; and</del></li> <li><del>5. does not adversely affect recreational values.</del></li> </ol>
355.4	HARRIS David	Policy 29	Support	Retain.
372.7	Heritage NZ	Policy 29	Amend	<p>Amend Policy 29 as follows:</p> <p>Policy 29 – Provide for the extraction of gravel</p> <p>Provide for the extraction of gravel to meet the needs of the community, in a way that avoids, remedies or mitigates adverse effects on rivers and their margins; and:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ol style="list-style-type: none"> <li>1. maintains or enhances aquatic and riparian habitat;</li> <li>or</li> <li>2. ensures no long-term net loss of habitat in the river channel and floodplain; or</li> <li>3. maintains or enhances flood protection, erosion control or the integrity of physical resources; and</li> <li>4. does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mataitai and taiapure; and</li> <li>5. does not adversely affect recreational values.</li> <li><u>6. avoids, remedies or mitigates adverse affects on historic heritage values.</u></li> </ol>
449.10	KiwiRail Holdings Ltd (KiwiRail)	Policy 29	Support	Retain Policy 29(3).
482.7	Lower Aparima Catchment Group	Policy 29	Amend	We suggest you strengthen the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion as appropriate.
523.2	MCGREGOR Grant	Policy 29	Support	Retain.
569.5	MILLER R J Trust	Policy 29	Support	Retain.
614.5	NZ Transport Agency	Policy 29	Support	Retain.
616.5	O'CONNELL Elizabeth	Policy 29	Support	Retain.
640.21	Pourakino Catchment Group	Policy 29	Support	Retain.
681.10	Rockytommy Farming Ltd	Policy 29	Support	Retain.
682.6	Rokenwai Farming Ltd	Policy 29	Support	Retain.
742.5	South Island Eel Industry Association	Policy 29	Support	Retain
749.56	Southland Conservation Board	Policy 29	Amend	<p>Provide for the extraction of gravel in a way that avoids, remedies or mitigates adverse effects on rivers and their margins and</p> <ol style="list-style-type: none"> <li>(6) maintains or enhances aquatic or riparian habitat <del>or</del> <u>and</u></li> <li>(7) ensures no long term net loss of habitat in the river channel and flood plain, <del>or</del> <u>and</u></li> <li>(8) maintains or enhances flood protection, erosion control or the integrity of physical resources, and</li> <li>(9) does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, and taiapure, and</li> <li>(10) does not adversely affect recreational values.</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.70	Southland Fish & Game Council	Policy 29	Support Amend	Amend Policy 29 as follows: “Provide for the extraction of gravel to meet the needs of the community, in a way that avoids, remedies or mitigates adverse effects on rivers and their margins; and: <ol style="list-style-type: none"> <li>1. <del>Maintains or enhances</del> <u>improves</u> aquatic and riparian habitat, <u>including the habitat of trout and salmon and wildlife. Methods of gravel extraction that can result in the creation of habitats for fish and wildlife will be encouraged, where appropriate;</u> <del>or and</del></li> <li>2. Ensures no <del>net</del>-loss of habitat in the river channel, <del>bed, and</del> floodplain <u>and riparian</u> habitat and <u>that the rate of gravel extraction is sustainable;</u> <del>or and</del></li> <li>3. Maintains or <del>enhances</del> <u>improves</u> flood protection, erosion control or the integrity of physical resources; and</li> <li>4. Does not adversely affect the cultural values associated with the river, including mahinga kai and taonga species habitat, mataitai and taiapure; and</li> <li>5. <del>Does not adversely affect recreational values</del> <u>Maintains or improves recreational values;</u> and</li> <li>6. <u>Maintains or improves landscape, natural character of rivers and their margins, natural features and amenity values;</u> and</li> <li>7. <u>Maintains or improves any legal access to the river, modified watercourse, stream or lake.</u></li> </ol>
753.2	Southland River Liaison Committees	Policy 29	Support	Retain.
759.8	Springlands Group Ltd	Policy 29	Support	Retain.
792.10	TAYLER Matthew	Policy 29	Support in part Amend	Landowners should be able to remove a limited amount of gravel provided GMP’s are observed to help maintain flood capacity without the need for obtaining a resource consent.
797.26	Nga Runanga and TRONT	Policy 29	Support in part	Amend clause (4) to read: ...does not adversely effect the Ngāi Tahu values associated with the river, including <del>mahinga kai and</del> taonga species, habitat, <u>mahinga kai</u> , māitaitai and taiāpure; and Retain remainder of policy as worded.
798.2	TEMPLETON Luke	Policy 29	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				erosion.
799.3	TEMPLETON Peter	Policy 29	Amend	Plan should have stronger regulation of wastewater treatment, septic tanks, sewage systems/discharge, stormwater and industrial effects.
802.15	The 254 Partnership & Gerken Family Trust	Policy 29	Support	Retain.
810.21	Three Rivers Catchment Group (TRCG)	Policy 29	Support	Retain.
811.15	THYS Herman & STAUT Tinneke	Policy 29	Support	Retain.
832.44	VAN GOOL Raewyn	Policy 29	Support	Retain.
861.15	WHITE John Copeland	Policy 29	Amend	We suggest you strengthen the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion as appropriate.
869.2	WILKINS Pam	Policy 29	Support	Retain.
877.30	WILSON Aaron	Policy 29	Support	Retain.
880.36	WILSON Shannon	Policy 29	Support	Retain.

### Policy 30 – Drainage maintenance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
3.2	A P & S M Verhaegh Ltd	Policy 30	Support	Retain.
24.49	Aratiatia Livestock Ltd	Policy 30	Support	Retain.
25.17	Ardel Dairies Ltd	Policy 30	Support	Retain.
89.21	BRENTLEIGH Family Trust	Policy 30	Support	Retain.
92.4	Bristol Grove Dairies	Policy 30		Amend to acknowledge that appropriate drainage and maintaining flood capacity is not only beneficial, but necessary to the economical sustainability of our province.
108.46	BYTHELL Jesse	Policy 30	Support	I ask that the word ‘wetland’ be added to clause (1) so that it reads “avoids, remedies or mitigates significant adverse effects on the aquatic environment and <u>nearby naturally occurring wetlands</u> ;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				or”
136.1	CLARKE Alanna	Policy 30	Support	Retain.
139.1	CLARKE David	Policy 30	Support	Retain.
186.3	D R & J A E Pullar Ltd	Policy 30	Support	Retain.
205.16	Dillon Ag Ltd (Chris Dillon)	Policy 30	Support	Retain.
206.16	Dillon Ag Ltd (Rochelle Dillon)	Policy 30	Support	Retain.
209.18	DIPROSE Dave	Policy 30	Support	Retain.
210.63	Director-General of Conservation	Policy 30	Oppose	<p>Amend Policy 30 – <u>Stream and</u> Drainage maintenance to read:</p> <p>In recognition of the community benefits of maintaining flood capacity and land drainage, ensure that drainage maintenance activities within artificial watercourses and the beds of modified watercourses <u>and their margins</u> are managed in a way that:</p> <ol style="list-style-type: none"> <li>1. <u>Prevents or reduces the quantity of sediment in overland flow entering into the modified stream or artificial drain;</u></li> <li>2. <u>Manage the margins of artificial drain to ensure that stock do not damage its margins or banks;</u></li> <li>3. <u>protects the life supporting capacity and habitat of fish within modified streams in particular;</u> <ol style="list-style-type: none"> <li>a. <u>the gravel spawning habitat of fish;</u></li> <li>b. <u>the habitat of threatened non migratory galaxiids; and</u></li> <li>c. <u>where fish passage has been lost through drainage maintenance restore fish passage;</u></li> </ol> </li> <li>2. avoids remedies or mitigates <u>other</u> significant adverse effects on the other aquatic environment; or</li> </ol> <p>2. maintains or enhances habitat value.</p>
220.10	Drylands Farming Ltd	Policy 30	Support	Retain.
221.10	DRYSDALE Family Trust	Policy 30	Support	Retain.
279.36	Forest & Bird NZ	Policy 30	Support with minor	Amend Policy 30 as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			amendment	In recognition of the community benefits of maintaining flood capacity and land drainage, ensure that drainage maintenance activities within artificial watercourses and the beds of modified watercourses are managed in a way that either: 1. avoids, <del>remedies or mitigates</del> significant adverse effects on the aquatic environment; <u>including the natural character and areas of significant indigenous vegetation and habitats of indigenous species</u> 2. maintains or enhances <u>degraded</u> habitats
292.8	G S & M A Clearwater Ltd	Policy 30	Support	Retain.
348.3	HAMILTON Blair	Policy 30	Oppose	What will it achieve as a blocked drain will retain water, again imposing a cost without reason?
355.5	HARRIS David	Policy 30	Amend	Provide maps showing which rivers are in a natural state and which are modified watercourses.
387.6	HORRELL Andrew	Policy 30	Support	Retain.
411.16	Invercargill City Council	Policy 30	Support	Retain.
449.11	KiwiRail Holdings Ltd (KiwiRail)	Policy 30	Support	Retain
523.3	MCGREGOR Grant	Policy 30	Support	Retain.
614.6	NZ Transport Agency	Policy 30	Support	Retain.
640.22	Pourakino Catchment Group	Policy 30	Support	Retain.
742.6	South Island Eel Industry Association	Policy 30		Change to: In recognition of the community benefits of maintaining flood capacity and land drainage, ensure that drainage maintenance activities within artificial watercourses and the beds of modified watercourses are managed in a way that either: 1. Avoids, remedies or mitigates significant adverse effects on the aquatic environment; or 2. Maintains or enhances habitat value, <u>including taonga species listed in Appendix M.</u>
749.57	Southland Conservation Board	Policy 30	Support	Retain.
752.71	Southland Fish & Game Council	Policy 30	Oppose	Amend Policy 30 as follows: <b>“Stream and Drainage maintenance</b> In recognition of the community benefits of maintaining flood capacity and land drainage, ensure that drainage maintenance activities within artificial watercourses and the beds of modified watercourses <u>and their margins</u> are managed in a way that <del>either</del> :

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ol style="list-style-type: none"> <li>1. <u>Avoids or mitigates the quantity of sediment in overland flow entering the artificial watercourse or modified watercourse;</u></li> <li>2. <u>Protects the life supporting capacity and habitat of fish within modified watercourses, including:</u> <ol style="list-style-type: none"> <li>a. <u>Maintains or improves fish passage where it has been degraded by drainage maintenance; and</u></li> <li>b. <u>Maintains or improves gravel spawning habitat where it has been degraded by drainage maintenance; and</u></li> <li>c. <u>Maintains or improves bank stability.</u></li> </ol> </li> <li>3. <del>Avoids, remedies or mitigates</del> <u>Avoids, remedies or mitigates</u> significant adverse effects on the aquatic environment, <u>including natural character, riparian margins, significant indigenous vegetation and spawning habitat: or</u></li> <li>4. <del>Maintains or enhances</del> <u>Maintains or improves</u> degraded habitats <del>value, including instream habitat, natural character and riparian margins.”</del></li> </ol>
753.3	Southland River Liaison Committees	Policy 30	Support	Retain.
802.16	The 254 Partnership & Gerken Family Trust	Policy 30	Support	Retain.
810.22	Three Rivers Catchment Group (TRCG)	Policy 30	Support	Retain.
811.16	THYS Herman & STAUT Tinneke	Policy 30	Support	Retain.
832.45	VAN GOOL Raewyn	Policy 30	Support	Retain.
877.31	WILSON Aaron	Policy 30	Support	Retain.
880.37	WILSON Shannon	Policy 30	Support	Retain.

### Policy 31 – Whitebait stands



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.50	Aratiatia Livestock Ltd	Policy 31	Support	Retain.
25.18	Ardel Dairies Ltd	Policy 31	Support	Retain.
89.22	BRENTLEIGH Family Trust	Policy 31	Support	Retain.
205.17	Dillon Ag Ltd (Chris Dillon)	Policy 31	Support	Retain.
206.17	Dillon Ag Ltd (Rochelle Dillon)	Policy 31	Support	Retain.
210.64	Director-General of Conservation	Policy 31	Support in part	Retain Policy 31 as notified with: Restrict the allocation of space for whitebait stands in the beds of lakes, rivers, modified watercourses and streams to: 1. stands lawfully existing as of 1 June 2003; or 2. new stands used in lieu of previously lawfully existing stands, but as close as practical to the former site where that site can no longer be used because of either natural alterations to the course of the river, bank erosion or high-water mark alterations <u>and the site complies with the relevant whitebait regulations.</u>
749.58	Southland Conservation Board	Policy 31	Support	Retain.
752.72	Southland Fish & Game Council	Policy 31	Support	Retain.
802.17	The 254 Partnership & Gerken Family Trust	Policy 31	Support	Retain.
832.46	VAN GOOL Raewyn	Policy 31	Support	Retain.

### Policy 32 – Protect significant indigenous vegetation and habitat

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.51	Aratiatia Livestock Ltd	Policy 32	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.24	Ballance Agri-Nutrients	Policy 32	Oppose in part	Amend to read: <b>Policy 32</b> Protect significant indigenous vegetation and significant habitats of indigenous fauna <u>so as to maintain</u> <del>to improve</del> soil health, water quality, water quantity and ecosystem health.
108.47	BYTHELL Jesse	Policy 32	Support	I ask that educational resources be developed to explain what ‘significant indigenous vegetation’ means in Southland.
210.65	Director-General of Conservation	Policy 32	Support in part	Retain Policy 32 as notified with the following addition: Protect significant indigenous vegetation and significant habitats of indigenous fauna to improve soil health, water quality, water quantity and ecosystem health <u>and to maintain indigenous biodiversity.</u>
279.37	Forest & Bird NZ	Policy 32	Support with minor amendment	Amend Policy 32 as follows: Protect <del>significant</del> indigenous vegetation and <del>significant</del> habitats of indigenous fauna to: <u>maintain indigenous biodiversity.</u> improve soil health, water quality, water quantity and ecosystem health
411.17	Invercargill City Council	Policy 32		Delete
437.15	KEMPTHORNE Robert	Policy 32	Oppose in part	Amend Policy to clarify the meaning behind “significant indigenous vegetation” or provide an acceptable definition of “significant” in this context to provide clarity.
614.7	NZ Transport Agency	Policy 32	Oppose	Delete.
640.23	Pourakino Catchment Group	Policy 32	Oppose	Delete.
742.7	South Island Eel Industry Association	Policy 32		We recommend a change of Policy 32 to: Protect significant indigenous vegetation and significant habitats of indigenous fauna and improve soil health, water quality, water quantity, <u>harvest values (including bioaccumulation of hazardous substances)</u> and ecosystem health.
749.59	Southland Conservation Board	Policy 32	Support	Retain.
750.6	Southland District Council	Policy 32	Neutral	Amendments to clarify the relationship between the objective, policies and rules, as the objective and policy refer to dryland areas but the rules relate only to wetlands.
752.73	Southland Fish & Game Council	Policy 32	Support	Retain.
792.11	TAYLER Matthew	Policy 32	Amend	Recognise that indigenous vegetation enhanced by landowners is not naturally occurring and therefore not subject to the same constraints/regulations as that naturally persisting

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
810.23	Three Rivers Catchment Group (TRCG)	Policy 32	Oppose	Delete.
832.47	VAN GOOL Raewyn	Policy 32	Support	Retain.

### Policy 33 – Adverse effects on wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.52	Aratiatia Livestock Ltd	Policy 33	Support	Retain.
52.4	Bathurst Resources Ltd	Policy 33		Reword Policy 33 as follows: “ <del>Prevent the reduction in</del> Encourage the protection of the area, function and quality of wetlands, <del>including through drainage and vegetation removal of</del> <u>significance.</u> ”
139.2	CLARKE David	Policy 33	Oppose	If a duck pond or sediment pond is full with sediment can it be removed and spread back on the land it came from?
181.2	CRUICKSHANK Peter & Liz	Policy 33		Delete and replace with existing use rights.
209.19	DIPROSE Dave	Policy 33		Prevent the reduction in area, function and quality of <u>natural formed</u> wetlands, including through drainage and vegetation removal.
210.66	Director-General of Conservation	Policy 33	Support	Retain.
265.55	Federated Farmers of NZ (Southland Province)	Policy 33	Oppose in part	Delete Policy 33, or amend as follows:  Prevent the reduction in area, function and quality of <u>significant natural</u> wetlands, including through drainage and vegetation removal.
279.38	Forest & Bird NZ	Policy 33	Amend	Amend Policy 33 as follows: <u>Protect the significant values of wetlands and preserve the natural character of wetlands by <del>P</del> preventing</u> the reduction in area, function and quality of wetlands, including through drainage and vegetation removal.
292.9	G S & M A Clearwater Ltd	Policy 33	Support	Retain.
390.17	Horticulture NZ	Policy 33	Support in	Amend Policy 33:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	Prevent the reduction in areas, function and quality of <u>natural</u> wetlands, including through drainage and vegetation removal.
395.1	HUDSON P D & P A E	Policy 33	Oppose	This should be a case by case situation.
640.24	Pourakino Catchment Group	Policy 33	Oppose	Amend wording to 'natural wetland'
712.22	Seaview Trust & Oraka Farms Ltd	Policy 33	Support Amend	"Prevent the reduction in area, function and quality of significant wetlands, including through drainage and vegetation removal".
742.8	South Island Eel Industry Association	Policy 33		Change to: prevent the reduction in area, function and quality of wetlands, including through <u>discharges</u> , drainage and vegetation removal..
749.60	Southland Conservation Board	Policy 33	Support	Retain.
752.74	Southland Fish & Game Council	Policy 33	Support	Retain.
810.24	Three Rivers Catchment Group (TRCG)	Policy 33	Oppose	Amend wording to 'natural wetland'
832.48	VAN GOOL Raewyn	Policy 33	Support	Retain.

#### Policy 34 – Restoration of existing wetlands and the creation of wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.53	Aratiatia Livestock Ltd	Policy 34	Support	Retain.
108.48	BYTHELL Jesse	Policy 34	Support	I support Policy 34, but seek to have the diversity of wetlands types recognised and provided for.
139.3	CLARKE David	Policy 34	Oppose	If a duck pond or sediment pond is full with sediment can it be removed and spread back on the land it came from?
210.67	Director-General of Conservation	Policy 34	Support	Retain.
265.56	Federated Farmers of NZ (Southland Province)	Policy 34	Support in part	Amend Policy 34 to read: Recognise the importance of <u>natural</u> wetlands <del>and indigenous biodiversity</del> , particularly the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				potential to improve water quality, through encouraging: <ol style="list-style-type: none"> <li>1. the maintenance and restoration of existing wetlands and the creation of new wetlands; and</li> <li>2. the establishment of wetland areas, including on-farm, in subdivisions, on industrial sites and for community sewage schemes; and</li> <li>3. offsetting peak flows and assisting with flood control.</li> </ol>
277.33	Fonterra Co-operative Group Ltd	Policy 34	Support in part	Amend Policy 34 so as to read: “Policy 34 – Restoration of existing wetlands, <del>and</del> the creation of wetlands <u>and riparian planting</u> Recognise the importance of wetlands and indigenous biodiversity, particularly the potential to improve water quality, through encouraging: <ol style="list-style-type: none"> <li>1. the maintenance and restoration of existing wetlands and the creation of new wetlands; and</li> <li>2. the establishment of wetland areas <u>and indigenous riparian plantings adjacent to waterbodies</u>, including on-farm, in subdivisions, on industrial sites and for community sewage schemes; and</li> <li>3. offsetting peak flows and assisting with flood control.”</li> </ol>
279.39	Forest & Bird NZ	Policy 34	Support	Retain.
292.10	G S & M A Clearwater Ltd	Policy 34	Support	Retain.
387.7	HORRELL Andrew	Policy 34	Support	Retain.
586.4	MOUAT Family Trust	Policy 34	Support	Retain.
622.13	P F Olsen Ltd	Policy 34	Support Amend	Amend policy to include recognition of value as a farm management tool for diffuse discharge treatment.
640.25	Pourakino Catchment Group	Policy 34	Amend	Policy 34 – Recognise the importance of <u>natural</u> wetlands and indigenous <u>flora biodiversity</u> , particularly the potential to improve water quality, through encouraging: <ol style="list-style-type: none"> <li>1. the maintenance and restoration of existing <u>natural</u> wetlands and the creation of new wetlands; and</li> <li>2. the establishment of wetland areas, including on-farm, in subdivisions, on industrial sites and for community sewage schemes; and</li> <li>3. offsetting peak flows and assisting with flood control</li> </ol>
749.61	Southland Conservation Board	Policy 34	Support	Retain.
752.75	Southland Fish & Game	Policy 34	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			
792.12	TAYLER Matthew	Policy 34	Support in part	ES should forgo any consent costs associated with establishing and enhancing wetlands and should resource their land sustainability officers to provide quality advice and potentially subsidize significant works.
810.25	Three Rivers Catchment Group (TRCG)	Policy 34	Amend	Policy 34 – Recognise the importance of <u>natural</u> wetlands and indigenous <u>flora biodiversity</u> , particularly the potential to improve water quality, through encouraging: <ol style="list-style-type: none"> <li>1. the maintenance and restoration of existing <u>natural</u> wetlands and the creation of new wetlands; and</li> <li>2. the establishment of wetland areas, including on-farm, in subdivisions, on industrial sites and for community sewage schemes; and</li> <li>3. offsetting peak flows and assisting with flood control</li> </ol>
832.49	VAN GOOL Raewyn	Policy 34	Support	Retain.

#### Policy 35 – Discharge waste and cleanfill appropriately

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.54	Aratiatia Livestock Ltd	Policy 35	Support	Retain.
108.49	BYTHELL Jesse	Policy 35	Support	Retain.
279.40	Forest & Bird NZ	Policy 35	Support	Retain.
288.23	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 35	Support in part	Support Policy 35 on the basis that the appropriateness of a cleanfill site is defined by Rule 42 with amendments:  Policy 35 – Discharge waste and cleanfill appropriately  <u>Provide for the discharge of cleanfill and ensure the discharge of contaminants as waste or cleanfill occurs at an appropriate site.</u>
342.6	H W Richardson Group	Policy 35	Support	Retain.
411.18	Invercargill City Council	Policy 35	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
449.12	KiwiRail Holdings Ltd (KiwiRail)	Policy 35	Support	Retain
752.76	Southland Fish & Game Council	Policy 35	Support	Retain.
832.50	VAN GOOL Raewyn	Policy 35	Support	Retain.

### Policy 36 – Manage land contamination

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.55	Aratiatia Livestock Ltd	Policy 36	Support	Retain.
48.25	Ballance Agri-Nutrients	Policy 36	Support (in principle)	Retain.
108.50	BYTHELL Jesse	Policy 36	Support	Retain.
279.41	Forest & Bird NZ	Policy 36	Support	Retain.
449.13	KiwiRail Holdings Ltd (KiwiRail)	Policy 36	Support	Retain
661.25	Ravensdown Ltd	Policy 36	Support	Retain.
752.77	Southland Fish & Game Council	Policy 36	Support	Retain Policy 36 as notified with the following amendment: “Require the best practicable option be adopted to <del>prevent or minimise</del> <u>avoid, remedy or mitigate</u> adverse effects from contaminated land or a discharge of a hazardous substance.”
803.26	The Fertiliser Association of NZ	Policy 36	Support	Retain.
832.51	VAN GOOL Raewyn	Policy 36	Support	Retain.
895.33	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 36	Amend	Amend Policy 36 to appropriately recognise that contamination is the result of an historic incident and that it is not possible to prevent this contamination which should instead be managed using the best practicable option. This could be achieved by amending Policy 36 as

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>follows and, if justified by S32 analysis, introducing a new policy particular to requiring the best practicable option to prevent or minimise adverse effects from the discharge of hazardous substances.</p> <p><b>Policy 36 – Manage <del>land-contaminated</del>ion land</b></p> <p>Require the best practicable option be adopted to <del>prevent or minimise</del> <u>manage</u> adverse effects from contaminated land <del>or a discharge of a hazardous substance.</del></p> <p><b>Policy x – Require the best practicable option be adopted to prevent or minimise adverse effects from the discharge of a hazardous substance.</b></p>

### Policy 37 – Climate change

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.56	Aratiatia Livestock Ltd	Policy 37	Support	Retain.
108.51	BYTHELL Jesse	Policy 37	Support	Retain.
210.68	Director-General of Conservation	Policy 37	Oppose	Delete.
249.15	Ernslaw One Ltd	Policy 37	Amend	<p>Obtain a Lidar digital terrain model for the coastal settlements in the Region to support the Land and Water Plan to better identify land at risk from flooding and inundation.</p> <p>In the absence of a National Policy Statement or a National Environmental Standard on Sea Level Rise, develop a Coastal Hazards policy with Rules to address impacts of sea level rise expected over the next 100 years, with Plan rules to trigger a managed retreat from low lying areas starting this decade.</p>
265.57	Federated Farmers of NZ (Southland Province)	Policy 37	Support in part	<p>Amend Policy as follows:</p> <p><del>Avoid or mitigate</del> <u>Manage</u> adverse effects on the environment arising from climate change by recognising and providing for the development and protection of the built environment and infrastructure in a manner that takes into account the potential effects of rising sea levels and the potential for more variable and extreme weather patterns in coming decades.</p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.42	Forest & Bird NZ	Policy 37	Support	Retain.
299.12	GARDYNE John	Policy 37	Oppose	Put in “manage”.
464.11	Landpro Ltd	Policy 37	Amend	Replace the word ‘by’ with ‘while’.
518.5	MCDONALD Stuart & HALDER Robyn	Policy 37		Some ‘rules’ could be included to aid in this Policy implementation. Give the farmer some discretion please and acknowledge his ‘hands on’ management, coping with everyday issues, given that most environmental challenges arise during weather extremes.
614.8	NZ Transport Agency	Policy 37	Support	Retain.
664.17	Real Journeys Ltd	Policy 37		The Climate Change policy needs to also reference the likely increase in frequency of major flood events.
666.9	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 37	Amend	Move this Policy up into top 5 Policies.
731.6	SMITH Barry	Policy 37		Clarify the meaning of the policy and the anticipated sea level rise. Clarify process for public to comment on steps taken to avoid or mitigate effects.
749.62	Southland Conservation Board	Policy 37	Support	Retain.
793.1	TAYLER Phillip	Policy 37	Amend	Agriculture needs to be able to respond to climate change. The definition of Alpine may change over time i.e. snow level rising, change in vegetation.
832.52	VAN GOOL Raewyn	Policy 37	Oppose	I disagree with including climate change in this Plan. Individuals, urban, district councils should be held responsible to mitigate or avoid any adverse effects.

### Policy 38 – Natural hazards

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.57	Aratiatia Livestock Ltd	Policy 38	Support	Retain.
108.52	BYTHELL Jesse	Policy 38	Support	Retain.
279.43	Forest & Bird NZ	Policy 38	Support	Retain.
411.19	Invercargill City Council	Policy 38	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
523.4	MCGREGOR Grant	Policy 38	Support	Retain.
614.9	NZ Transport Agency	Policy 38	Support	Retain.
627.4	PATERSON Ross	Policy 38	Support	Retain.
628.5	PATERSON Stephanie	Policy 38	Support	Retain.
753.4	Southland River Liaison Committees	Policy 38	Support	Retain.
832.53	VAN GOOL Raewyn	Policy 38	Support	Retain.
895.34	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 38	Support	Retain.

### Policy 39 – Application of the permitted baseline

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
7.2	AdBest Partnership	Policy 39	Oppose	Delete.
24.58	Aratiatia Livestock Ltd	Policy 39	Support	Acknowledge the national, regional and local benefits of farming.
25.19	Ardel Dairies Ltd	Policy 39	Oppose	Delete.
48.26	Ballance Agri-Nutrients	Policy 39	Oppose	Delete.
80.15	BLAKELY Barney & Stephanie	Policy 39	Oppose	Delete.
81.17	BLAKELY Hamish & Hannah	Policy 39	Oppose	Delete.
89.23	BRENTLEIGH Family Trust	Policy 39	Oppose	Delete.
108.53	BYTHELL Jesse	Policy 39	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
147.1	CLEMENT Karina	Policy 39	Amend	Time frame included in Consent application process. Make farm organisation easier with an ES timeframe.
172.11	COWAN Les & Christine	Policy 39	Oppose	Delete.
181.3	CRUICKSHANK Peter & Liz	Policy 39		Remove resource consent requirement for existing sheep farming practice such as rotational cropping.
189.20	Dairy Holdings Ltd	Policy 39	Oppose	Delete.
205.18	Dillon Ag Ltd (Chris Dillon)	Policy 39	Oppose	Delete.
206.18	Dillon Ag Ltd (Rochelle Dillon)	Policy 39	Oppose	Delete.
207.3	Dillon Grain Ltd	Policy 39	Oppose	Delete.
209.20	DIPROSE Dave	Policy 39	Oppose	Replace 39a with 39 as this covers the intention.
210.69	Director-General of Conservation	Policy 39	Support in part	Amend Policy 39 by: When considering any application for resource consent for the use of land for a farming activity, Environment Southland will consider all adverse effects of the proposed activity on water quality <u>and water quantity</u> , whether or not this Plan permits an activity with that effect.
265.58	Federated Farmers of NZ (Southland Province)	Policy 39	Oppose	Delete.
266.2	Fenham Downs Ltd	Policy 39	Oppose	If this law is made consent process should be free.
277.34	Fonterra Co-operative Group Ltd	Policy 39	Oppose	Delete.
279.44	Forest & Bird NZ	Policy 39	Support with minor amendment	Amend Policy 39 as follows: When considering any application for resource consent for the use of land for a farming activity, Environment Southland will consider all adverse effects of the proposed activity on water quality <u>and quantity</u> , whether or not this Plan permits an activity with that effect.
288.24	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 39	Oppose	Delete.
292.11	G S & M A Clearwater Ltd	Policy 39	Oppose	Delete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
358.12	HASTIE Stephen	Policy 39	Oppose	Let businesses have their right of freedom of choice.
365.1	HEENAN M D and D W	Policy 39	Amend	Amend the policy to acknowledge existing investment and infrastructure on farm, so that landholders have certainty for their investments.
614.10	NZ Transport Agency	Policy 39	Oppose	Delete.
640.26	Pourakino Catchment Group	Policy 39	Oppose	Delete.
647.1	Progressive Engineering Southland Ltd	Policy 39	Oppose	Delete.
661.26	Ravensdown Ltd	Policy 39	Oppose	Delete.
710.3	Schrader Mains Ltd	Policy 39		Delete.
749.63	Southland Conservation Board	Policy 39		The Board is a statutory body which should be consulted on matters within its authority and jurisdiction.
752.78	Southland Fish & Game Council	Policy 39	Support Amend	Retain Policy 30 as notified with the following amendment: “When considering any application for resource consent for the use of land for a farming activity, Environment Southland will consider all adverse effects of the proposed activity on water quality <u>and water quantity</u> , whether or not this Plan permits an activity with that effect.”
802.18	The 254 Partnership & Gerken Family Trust	Policy 39	Oppose	Delete.
803.27	The Fertiliser Association of NZ	Policy 39	Oppose	Delete.
810.26	Three Rivers Catchment Group (TRCG)	Policy 39	Oppose	Delete Policy 39. Change Policy 39A to Policy 39A.
832.54	VAN GOOL Raewyn	Policy 39	Support	Delete ‘farming’ and change to ‘any’.
895.35	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 39	Support	Retain.

### Policy 39A – Integrated management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.59	Aratiatia Livestock Ltd	Policy 39A	Support	That ES should, as a matter of policy, petition central government to align the timetable for the application of the National Policy on Freshwater, to the Waiau catchment, with the timetable for the renewal or otherwise of the operating Resource Consents for the Manapouri Hydro Scheme.
108.54	BYTHELL Jesse	Policy 39A	Support	Retain.
172.12	COWAN Les & Christine	Policy 39A	Oppose	Delete.
189.21	Dairy Holdings Ltd	Policy 39A		Amend Policy 39A as follows: To improve integrated management of freshwater and the use and development of land in whole catchments, including the interactions between freshwater, land and associated ecosystems (including estuaries) <u>through encouraging initiatives such as nutrient user groups that collectively manage nitrogen losses.</u>
210.70	Director-General of Conservation	Policy 39A	Support	Retain.
277.35	Fonterra Co-operative Group Ltd	Policy 39A	Support in part	Amend Policy 39A to include clarification of how Policy 39A is to achieve integrated management in the context of individual resource consent applications.
279.45	Forest & Bird NZ	Policy 39 A	Support with minor amendment	Amend Policy 39A as follows: To improve integrated management of freshwater and the use and development of land in whole catchments, including the interactions between freshwater, land and associated ecosystems (including estuaries <u>To improve integrated management of freshwater and the use and development of land in whole catchments, including the interactions between freshwater, land and associated ecosystems (including estuaries and the coastal marine area).</u>
292.12	G S & M A Clearwater Ltd	Policy 39A	Support	Please remove Policy 39 and maintain 39a.
390.18	Horticulture NZ	Policy 39A	Oppose	Delete
437.16	KEMPTHORNE Robert	Policy 39A	Oppose in part	Reword to reflect consideration given <i>mostly</i> to the effects within the upper/middle/lower aspects of catchments rather than the <i>whole</i> .
752.79	Southland Fish & Game Council	Policy 39A	Support	Retain.
797.27	Nga Runanga and TRONT	Policy 39A	Support	Retain.
832.55	VAN GOOL Raewyn	Policy 39A	Support	Retain.
895.36	Z Energy, BP Oil NZ &	Policy 39A	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Mobil Oil NZ (Oil Companies)			

### Policy 40 – Determining the term of resource consents

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
3.3	A P & S M Verhaegh Ltd	Policy 40	Support Amend	Considerable investment is often outlaid when alteration/improvements are made to effluent systems and this should be taken into account when considering the duration of consent.
24.60	Aratiatia Livestock Ltd	Policy 40	Support	That ES acknowledges that the “permanence and economic life” provision of 20(4) apply to FDE systems and that typically consent terms for FDE systems will typically be granted for a minimum 15 year term unless significant factors mitigate against a shorter period.
25.20	Ardel Dairies Ltd	Policy 40	Oppose	Rewrite the plan with more exact information so that all terms and timeframes are concise and transparent.
26.6	Ardoyne Farm Dairys	Policy 40	Support	Amend so that consideration is given to capital investment when granting terms of resource consents.
47.9	Balfour, Wendonside & Waikaia Group	Policy 40	Oppose in part	Delete Policy 40(7) and instead assess each application on its own merits, while retaining the right to review consents pursuant to Section 128 and 128 of the RMA.
48.27	Ballance Agri-Nutrients	Policy 40	Support in part	Amend to read: <b>Policy 40 – Determining the term of resource consents</b> When determining the term of a resource consent consideration will be given, but not limited, to: <ol style="list-style-type: none"> <li>1. granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource;</li> <li>2. relevant tangata whenua values and Ngāi Tahu indicators of health;</li> <li>3. the duration sought by the applicant, plus material to support the duration sought;</li> <li>4. the permanence and economic life of any capital investment;</li> <li>5. the desirability of applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource;</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				6. the applicant's compliance with the conditions of any previous resource consent; and the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of the any revised frameworks established in those sections.
54.5	Bayswater Dairy Ltd	Policy 40	Support	Retain.
80.16	BLAKELY Barney & Stephanie	Policy 40	Oppose	Delete.
81.18	BLAKELY Hamish & Hannah	Policy 40	Oppose	Remove from the plan.
89.24	BRENTLEIGH Family Trust	Policy 40	Oppose	Be upfront around timeframes.
108.55	BYTHELL Jesse	Policy 40	Support	Retain.
147.2	CLEMENT Karina	Policy 40	Amend	Time frame included in Consent application process. Make farm organisation easier with an ES timeframe.
172.13	COWAN Les & Christine	Policy 40	Oppose	Delete.
189.22	Dairy Holdings Ltd	Policy 40		Amend Policy 40.5 as follows: the desirability of <del>a common expiry date</del> <u>suitable review conditions</u> for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource;
191.6	DALE J M & K B	Policy 40	Oppose	Environment Southland must consider the financial, economic and social repercussions to Southland.
205.19	Dillon Ag Ltd (Chris Dillon)	Policy 40	Oppose	Amend to provide clear timeframes.
206.19	Dillon Ag Ltd (Rochelle Dillon)	Policy 40	Oppose	Amend to provide clear timeframes.
209.21	DIPROSE Dave	Policy 40	Support	Retain.
210.71	Director-General of Conservation	Policy 40	Support	Retain.
220.11	Drylands Farming Ltd	Policy 40	Support	Have a time frame, or fixed term, for all resource consents defined in any corresponding ruling.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	
221.11	DRYSDALE Family Trust	Policy 40	Support Amend	Have a time frame, or fixed term, for all resource consents defined in any corresponding ruling.
233.1	DYSON Valerie &Glyn	Policy 40	Amend	Delete policy 40 (7).
258.5	Eyre Creek Ltd	Policy 40	Oppose in part	Policy 40 is removed and council assess each application on its merit.
265.59	Federated Farmers of NZ (Southland Province)	Policy 40	Oppose	Delete.
277.36	Fonterra Co-operative Group Ltd	Policy 40	Support in part	Amend Policy 40 as follows: “Policy 40 – Determining the term of resource consents When determining the term of a resource consent consideration will be given, but not limited, to: 1. granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of irreversible adverse effects from the activity or the capacity of the resource; 2. relevant tangata whenua values and Ngāi Tahu indicators of health; 3. the duration sought by the applicant, plus material to support the duration sought; 4. the permanence and economic life of any capital investment, particularly where the investment serves to avoid or mitigate adverse effects of the activity; 5. the desirability of applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource; 6. the applicant’s compliance with the conditions of any previous resource consent; and 7. the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of <del>the</del> any revised frameworks established in those sections.”
279.46	Forest & Bird NZ	Policy 40	Support	Retain.
288.25	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 40	Oppose	Amend Policy 40 remove the uncertainty surrounding future plan development and Ngai Tahu indicators of health.  Policy 40 – Determining the term of resource consents



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				When determining the term of a resource consent consideration will be given, but not limited, to: 1. granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource; <del>2. relevant tangata whenua values and Ngāi Tahu indicators of health;</del> <del>3</del> 2. the duration sought by the applicant, plus material to support the duration sought; <del>4</del> 3. the permanence and economic life of any capital investment; <del>5</del> 4. the desirability of applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource; <del>6</del> 5. the applicant's compliance with the conditions of any previous resource consent; and <del>7. the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of the any revised frameworks established in those sections.</del>
292.13	G S & M A Clearwater Ltd	Policy 40	Support	Retain.
322.8	Glenlapa Station	Policy 40	Oppose	We believe that working with our LSO in conjunction with our FMP, we should be able to achieve satisfactory objectives in this regard.
330.8	Gore District Council, Invercargill City Council and Southland District Council	Policy 40	Oppose Amend	Policy 40 is amended as follows: <b>Policy 40 – Determining the term of resource consents</b> When determining the term of a resource consent consideration will be given, but not limited, to: 1. <u>how the resource consent will provide for social, economic and cultural wellbeing, as well as health and safety;</u> 2. granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource; ...
331.6	GRANT J J & J L	Policy 40	Support Oppose	Remove Policy 40(7) and use provisions currently in the RMA.
339.5	GUNN Olivia	Policy 40	Support	Retain.
377.2	HODGE Lynda	Policy 40	Oppose	The Decision I would like Environment Southland to make is: 15-25 year consents for all current and future farming operations.
378.2	HODGE Murray	Policy 40	Oppose	The Decision I would like Environment Southland to make is: 15–25 year consents for all current and future farming operations.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
402.3	HUNT Alistair & Bernadette	Policy 40	Amend	Delete.
411.20	Invercargill City Council	Policy 40	Support	Retain Point 4 and ensure that it is given due weight in consent decision making.
414.6	Irrigation NZ Incorporated	Policy 40		<u>Resource consents to take and use water shall have a general presumption of a 20-year term, however when determining the actual term of a resource consent consideration will also be given, but not limited, to:</u>
418.1	J McLean Farming Ltd	Policy 40	Oppose	Provide more information surrounding consents. How long will they take to process? What is the term of the consents?
447.2	Kiwi Dutch Dairies Ltd (John van Vliet)	Policy 40	Oppose	Amend to 15-25 year consents for all current and future farming operations.
448.2	Kiwi Dutch Dairies Ltd (Lucy van Vliet)	Policy 40	Oppose	Amend to 15-25 year consents for all current and future farming operations.
464.12	Landpro Ltd	Policy 40	Oppose in part	We seek that point 7 is removed from the Policy, and council instead assess each application on its own merits, while retaining the right to review resource consents pursuant to Sections 128 and 129 of the RMA.
478.15	LOVERIDGE David	Policy 40	Support	Part 4. Consideration be given to the capital investment when consents are granted.
482.8	Lower Aparima Catchment Group	Policy 40(4)	Support	We recommend capital investment must be taken into consideration with all consents.
483.14	Ludell Ltd	Policy 40	Oppose	Environment Southland must consider the financial, economic and social repercussions to Southland. The policy allows too much power to manipulate terms of consents.
523.5	MCGREGOR Grant	Policy 40	Support	Retain.
531.2	McKee Highview Ltd	Policy 40	Oppose	Reconsider the minimum term of consents to be reasonable and practical in relation to normal farming operations.
533.2	MCKEE Rebecca	Policy 40	Oppose	Reconsider the minimum term of consents to be reasonable and practical in relation to normal farming operations.
535.4	MCKEE Tyler	Policy 40	Oppose	No specific decision requested.
564.6	Mid-Aparima Catchment Group	Policy 40	Support	Retain.
586.5	MOUAT Family Trust	Policy 40	Support	Amend to provide financial support for sheep farm business implementing consents.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
614.11	NZ Transport Agency	Policy 40	Support	Retain.
640.27	Pourakino Catchment Group	Policy 40	Support	Retain.
661.27	Ravensdown Ltd	Policy 40	Oppose in part	Ravensdown seeks for Clause 6 in Policy 40 to be deleted, and Clause 7 be either re-written to remove any uncertainty, or deleted.
666.10	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 40	Support	Retain.
667.5	Riverfield farms Ltd	Policy 40	Support	Retain.
701.2	RUYGROK N C & N (Nicholas Ruygrok)	Policy 40	Oppose	15-25 year consents for all current and future farming operations.
702.2	RUYGROK N C & N (Nicolazina Ruygrok)	Policy 40	Oppose	15-25 year consents for all current and future farming operations.
712.23	Seaview Trust & Oraka Farms Ltd	Policy 40	Oppose	Delete.
737.13	Smithill Ltd	Policy 40	Amend	As mentioned in Policy 40, number 4 specifically; it should read “a resource consent WILL always take into account the economic impact on capital investment”. Specifically, the cost of implementing Rule 25 (a), (i) 2-3, and (a), (ii) mechanical cultivation on land with a slope greater than 20 degrees; restricts the land use and therefore the economic viability of the farm.
749.64	Southland Conservation Board	Policy 40		The Board is a statutory body which should be consulted on matters within its authority and jurisdiction.
750.7	Southland District Council	Policy 40	Support in part	It is acknowledged that subclause (d) already refers to the permanence and economic life of any capital investment; however Council wishes to reiterate that consideration should be given to this in the implementation of the plan. Recent consent applications made by Council have not had the full 35 year term granted with often little justification or reasoning why.
752.80	Southland Fish & Game Council	Policy 40	Support Amend	Retain Policy 40 as notified with the following amendment to Policy 40(1): “1. Granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects, <u>including cumulative adverse effects</u> , from the activity or the capacity of the resource.”
753.5	Southland River Liaison Committees	Policy 40	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
761.6	STALKER Hanna & Callum	Policy 40	Support	Retain.
792.13	TAYLER Matthew	Policy 40	Support in part Amend	I believe the policy needs to be amended so that the communities of Southland are not left vulnerable to natural hazards because it becomes too difficult for council to undertake maintenance and enhancements to flood capacity because of perceived environmental concerns.
792.14	TAYLER Matthew	Policy 40	Support	Retain.
802.19	The 254 Partnership & Gerken Family Trust	Policy 40	Oppose	The terminology used in this policy is too open – be up front about time frames.
803.28	The Fertiliser Association of NZ	Policy 40	Support in part Amend	Amend Policy 40 as follows: <b>Policy 40 – Determining the term of resource consents</b> When determining the term of a resource consent consideration will be given, but not limited, to: 1. granting a shorter duration when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource; 2. relevant tangata whenua values and Ngāi Tahu indicators of health; 3. the duration sought by the applicant, plus material to support the duration sought; 4. the permanence and economic life of any capital investment; 5. the desirability of applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource; <del>6. the applicant's compliance with the conditions of any previous resource consent; and</del> 7. the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of the any revised frameworks established in those sections.
810.27	Three Rivers Catchment Group (TRCG)	Policy 40	Support	Support point 4. Retain.
832.56	VAN GOOL Raewyn	Policy 40	Support	Retain.
860.2	WHITE John (Richard)	Policy 40	Amend	Include as an exception to having to get a consent, a farm management plan is written up with the involvement of an environment field officer overseeing the plan (could be specific to hill country).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
861.16	WHITE John Copeland	Policy 40	Support	We recommend capital investment must be taken into consideration with all consents.
868.9	Wilkins Farming Ltd	Policy 40	Oppose in part	Policy 40 is removed and council assess each application on its merit.
869.3	WILKINS Pam	Policy 40	Oppose	Point 7 of Policy 40 is removed and council assess each application on its merits.
877.32	WILSON Aaron	Policy 40	Oppose in part	The duration of all existing consents should not be altered. All re-consenting and new consenting done prior to limits being set in FMU should be granted without prejudice. Once FMU limits are set then variations or changes to existing and new consents can be made as each consent expires and is re-applied for.
880.38	WILSON Shannon	Policy 40	Oppose in part	The duration of existing consents should not be altered. All re-consenting and new consenting done prior to limits being set in FMU should be granted without prejudice. Once FMU limits are set then variations or changes to existing and new consents can be made as each consent expires and is reapplied for.
895.37	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 40	Amend	Ensure Policy 40 is amended to support consideration of both shorter and longer duration consents, depending on a particular activity and assessment of effects, and to recognise that consents terms granted should be effects based with S128 of the Act providing appropriately for a review of conditions to deal with adverse effects on the environment. This could be achieved by making the following changes: <u>Policy 40 – Determining the term of resource consents</u> When determining the term of a resource consent consideration will be given, but not limited, to: 1. <del>granting a shorter duration when there is uncertainty</del> regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource; 2. relevant tangata whenua values and Ngāi Tahu indicators of health; 3. the duration sought by the applicant, plus material to support the duration sought; 4. the permanence and economic life of any capital investment; 5. <del>the desirability of</del> applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource; 6. the applicant's compliance with the conditions of any previous resource consent; and 7. the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of the any revised frameworks established in those sections. <u>8. the ability to review conditions via S128 of the Act.</u>

## Policy 41 – Matching monitoring to risk

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.61	Aratiatia Livestock Ltd	Policy 41	Support	Retain.
92.5	Bristol Grove Dairies	Policy 41	Amend	Amend to acknowledge that this should also apply to farming enterprises in that a farm with a good track record of environmental compliance should have less auditing and monitoring than one that continually breaches consents.
92.6	Bristol Grove Dairies	Policy 41	Amend	Amend to acknowledge that this should also apply to farming enterprises in that a farm with a good track record of environmental compliance should have less auditing and monitoring than one that continually breaches consents.
108.56	BYTHELL Jesse	Policy 41	Support	Retain.
147.3	CLEMENT Karina	Policy 41	Amend	Time frame included in Consent application process. Make farm organisation easier with an ES timeframe.
189.23	Dairy Holdings Ltd	Policy 41	Support	Retain
265.60	Federated Farmers of NZ (Southland Province)	Policy 41	Oppose	Delete.
279.47	Forest & Bird NZ	Policy 41	Support	Retain.
288.26	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 41	Support	Retain.
411.21	Invercargill City Council	Policy 41	Support	Retain.
414.7	Irrigation NZ Incorporated	Policy 41		Consider the magnitude of environmental effects and risk, <u>and any existing regional monitoring network</u> , when determining requirements for auditing and supply of monitoring information on resource consents.
661.28	Ravensdown Ltd	Policy 41	Support	Ravensdown seeks for the intent of Policy 41 to be retained, while replacing the term ‘magnitude’ with the term ‘significance’.
749.65	Southland Conservation Board	Policy 41		The Board is a statutory body which should be consulted on matters within its authority and jurisdiction.
752.81	Southland Fish & Game Council	Policy 41	Support	Retain.
792.15	TAYLER Matthew	Policy 41	Amend	Amend wording to include “consider the magnitude of environmental effects and risk relative to cost of improvement option, be it regulation/rules, education and GMP’s or farm management

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				plans.”
803.29	The Fertiliser Association of NZ	Policy 41	Support	Retain.
832.57	VAN GOOL Raewyn	Policy 41	Support	Retain.
895.38	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 41	Support	Retain.

### Policy 42 – Consideration of water permit applications

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.23	Alliance Group Ltd	Policy 42	Oppose in part	Amend the point 5 as follows: 5. Conditions will be specified relating to a minimum flow/level in accordance with Appendix <del>E</del> K, to all new or replacement resource consents (except for water permits to community water supplies, <u>other priority water takes</u> and waterbodies subject to minimum flow and level regimes established under any water conservation order) for: (a) surface water abstraction, damming, diversion and use; and (b) groundwater abstraction where there is Riparian, Direct or High degree of hydraulic connection in accordance with Policy 23 ‘Stream Depletion Effects’ and the stream depletion effect exceeds two litres per second.
24.62	Aratiatia Livestock Ltd	Policy 42	Support	Retain.
108.57	BYTHELL Jesse	Policy 42	Support	Retain.
147.4	CLEMENT Karina	Policy 42	Amend	Time frame included in Consent application process. Make farm organisation easier with an ES timeframe.
172.14	COWAN Les & Christine	Policy 42	Oppose	Delete.
189.24	Dairy Holdings Ltd	Policy 42		Amend Policy 42(2) as follows: consents replacing an expiring resource consent for an abstraction from an over-allocated waterbody may be granted with a lesser volume and rate or take proportional to the amount of over-allocation and previous use, <u>using the method set out in Appendix O</u> ;
209.22	DIPROSE Dave	Policy 42	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
258.6	Eyre Creek Ltd	Policy 42	Oppose in part	Scientific proof to establish aquifer allocation must be independently achieved using internationally approved techniques. Allocation status of an aquifer needs to allow provision for review as water uses change from time to time.
265.61	Federated Farmers of NZ (Southland Province)	Policy 42	Oppose in part	<p>Amend as follows:</p> <p>When considering resource consent applications for water permits:</p> <ol style="list-style-type: none"> <li>consent will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased;</li> <li><del>consents replacing an expiring resource consent for an abstraction from an over-allocated waterbody may be granted with a lesser volume and rate or take proportional to the amount of over-allocation and previous use;</del></li> <li>installation of water measuring devices will be required on all new permits to take and use water, and existing permits in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010;</li> <li>where appropriate, minimum level and/or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed;</li> <li>conditions will be specified relating to a minimum flow/level, in accordance with Appendix L, to all new or replacement resource consents (except for water permits for Proposed Southland Water and Land Plan Page 39 community water supplies and waterbodies subject to minimum flow and level regimes established under any water conservation order) for: <ul style="list-style-type: none"> <li>(a) surface water abstraction, damming, diversion and use; and</li> <li>(b) groundwater abstraction where there is Riparian, Direct or High degree of hydraulic connection in accordance with Policy 23 “Stream Depletion Effects” and the stream depletion effect exceeds two litres per second.</li> </ul> </li> </ol>
277.37	Fonterra Co-operative Group Ltd	Policy 42	Support in part	<p>Amend Policy 42 as follows:</p> <p>“Policy 42 – Consideration of water permit applications</p> <p>When considering resource consent applications for water permits:</p> <ol style="list-style-type: none"> <li><del>except for takes for non-consumptive uses,</del> consent will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased;</li> <li>consents replacing an expiring resource consent for an abstraction from an over-allocated waterbody may be granted with a lesser volume and rate or take proportional to the amount of over-allocation and previous use, <u>taking into consideration the use of the water and the</u></li> </ol>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>value of investment associated with that use;</u></p> <p>3. installation of water measuring devices will be required on all new permits to take and use water, and existing permits in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010;</p> <p>4. <del>where appropriate, minimum level and/or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed;</del></p> <p>5. conditions will be specified relating to a minimum flow/level, in accordance with Appendix L, to all new or replacement resource consents (except for water permits for community water supplies and waterbodies subject to minimum flow and level regimes established under any water conservation order) for:</p> <p>(a) surface water abstraction, damming, diversion and use; and</p> <p>(b) groundwater abstraction where there is Riparian, Direct or High degree of hydraulic connection in accordance with Policy 23 “Stream Depletion Effects” and the stream depletion effect exceeds two litres per second.”</p>
279.48	Forest & Bird NZ	Policy 42	Support with minor amendment	<p>Amend Policy 42 (1) as follows:</p> <p>1. consent will not be granted if a waterbody is <u>over allocated</u>, fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased <u>and granting consent will not allow a target for the water body to be achieved within the defined time frame.;</u></p> <p>Amend Policy 42 (4) as follows:</p> <p><del>where appropriate, minimum level and/or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed;</del></p>
288.27	Fulton Hogan Ltd & Southern Aggregates Ltd	Policy 42	Oppose	Amend Policy 42(1) to be consistent with Policy 21(3) or amend both policies to clarify the water allocation regime and what will be considered through the consent process.
330.9	Gore District Council, Invercargill City Council and Southland District Council	Policy 42	Oppose Amend	<p>Amend Policy 42 as follows:</p> <p><b>Policy 42 – Consideration of water permit applications</b></p> <p>When considering resource consent applications for water permits:</p> <ol style="list-style-type: none"> <li>1. <u>consideration will be given as to how the water permit application will provide for social, economic and cultural well-being of communities as well as health and safety;</u></li> <li>2. consent will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased; ...</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
381.12	HOLDER Wendy & Tom	Policy 42		Change to read 'if a waterbody is fully allocated then review of existing consents to ensure no over allocation or inefficient use'. ES needs to recalculate expired consents with the same calculation as new consents. – delete 'all new' and replace with 'all.'
411.22	Invercargill City Council	Policy 42	Amend	That point 2 is amended so that when deciding if an allocation is to be reduced the following factors are taken into account: 1. Whether the original application was made before or after the threshold of over allocation was reached and then apply any necessary reduction to only those applications made after that threshold was exceeded. 1. Priority of use. Point 2 is reworded to read: 2 Consents replacing an expiring resource consent for an abstraction from an over allocated waterbody may be granted with a lesser volume and rate or take proportional to the amount of over allocation and previous use <u>subject to</u> : (i) <u>Whether the original application was made before or after the threshold of over allocation was reached and then apply any necessary reduction to only those applications made after that threshold was exceeded.</u> (ii) <u>Priority of use.</u>
464.13	Landpro Ltd	Policy 42	Support Amend	We seek that an exemption from requiring water metering as stipulated in Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 for all takes which do not need a resource consent or to consented takes which are less than 5 litres per second or that are non-consumptive is sought.
562.8	Meridian Energy Ltd	Policy 42	Support	Retain.
661.29	Ravensdown Ltd	Policy 42	Support in part	Ravensdown seeks for the intent of Policy 42 to be retained, while amending the policy to clarify it applies to the take and use of water, and not discharge.
749.66	Southland Conservation Board	Policy 42		The Board is a statutory body which should be consulted on matters within its authority and jurisdiction.
750.8	Southland District Council	Policy 42		Council is particularly concerned with the wording in clause 1 of the policy stating that consents will not be granted if waterbodies are fully or would be fully allocated as a result of the application. No specific decision requested.
752.82	Southland Fish & Game Council	Policy 42	Support	Retain Policy 42 as notified with the following amendment to Policy 42(1), (4) and (5): "1. consent will not be granted if a waterbody is <u>over allocated</u> , fully allocated, or to do so

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	<p>would result in a waterbody becoming over allocated or over allocation being increased <u>and granting consent will not allow a target for the waterbody to be achieved within the defined time period;</u></p> <p>...</p> <p>4. <del>where appropriate</del> minimum level and / or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed;</p> <p>5. conditions will be specified relating to a minimum flow / level <u>or environmental flow or level regime or flow sharing regime</u>, in accordance with Appendix L <u>or Policy X</u> [Insert number of new policy proposed by Fish &amp; Game titled <i>Instigate appropriate water conservation procedures</i>] to all new or replacement resource consents (except for water permits for community water supplies and waterbodies subject to minimum flow and level regimes established under any water conservation order) for: ..”</p>
792.16	TAYLER Matthew	Policy 42	Support in Part	<p>ES should match where practicable consent expiry dates from the same aquifer/waterway so that allocations can be managed collectively.</p> <p>Existing consent holders should be consulted about any subsequent water permit from the same source so as to help ensure a water source does not become over allocated and help ensure their water permit, which they obtained in good faith, is not subsequently compromised.</p>
797.28	Nga Runanga and TRONT	Policy 42	Oppose in part	<p>Amend policy to read:</p> <p>When considering resource consent applications for water permits:</p> <ol style="list-style-type: none"> <li>1. <u>a consent for a new water take</u> will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated <del>or over allocation being increased;</del></li> <li>2. consents replacing an expiring resource consent for an abstraction from an over-allocated waterbody <u>or where it would result in over allocation of a waterbody if approved will only be granted at a reduced rate</u> <del>may be granted with a lesser volume and rate or the reduction being</del> take proportional to the amount of over-allocation and previous use;</li> </ol>
832.58	VAN GOOL Raewyn	Policy 42	Support	Retain.
868.10	Wilkins Farming Ltd	Policy 42	Oppose in part	Scientific proof to establish aquifer allocation must be independently achieved using internationally approved techniques. Allocation status of an aquifer needs to allow provision for review as water uses change from time to time.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
895.39	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 42	Amend	<p>Amend Policy 42 to exempt abstraction for short term construction dewatering and reflect that the potential effects on water quantity from such activities do not justify this level of assessment. This could be achieved by amending Policy 42 as follows:</p> <p style="text-align: center;"><b>Policy 42 – Consideration of water permit applications</b></p> <p>When considering resource consent applications for water permits, <u>excluding applications to abstract groundwater for short term construction dewatering activities:</u></p> <ol style="list-style-type: none"> <li>1. consent will not be granted if a waterbody is fully allocated, or to do so would result in a waterbody becoming over allocated or over allocation being increased;</li> <li>2. consents replacing an expiring resource consent for an abstraction from an over-allocated waterbody may be granted with a lesser volume and rate or take proportional to the amount of over-allocation and previous use;</li> <li>3. installation of water measuring devices will be required on all new permits to take and use water, and existing permits in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010;</li> <li>4. where appropriate, minimum level and/or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed;</li> <li>5. conditions will be specified relating to a minimum flow/level, in accordance with Appendix L, to all new or replacement resource consents (except for water permits for community water supplies and waterbodies subject to minimum flow and level regimes established under any water conservation order) for: <ul style="list-style-type: none"> <li>(a) surface water abstraction, damming, diversion and use; and</li> <li>(b) groundwater abstraction where there is Riparian, Direct or High degree of hydraulic connection in accordance with Policy 23 “Stream Depletion Effects” and the stream depletion effect exceeds two litres per second.</li> </ul> </li> </ol>

### Policy 43 – Transfer of water permits

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.63	Aratiatia Livestock Ltd	Policy 43	Support	Retain.
89.25	BRENTLEIGH Family	Policy 43	Oppose	Delete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Trust			
108.58	BYTHELL Jesse	Policy 43	Support	Retain.
147.5	CLEMENT Karina	Policy 43	Amend	Time frame included in Consent application process. Make farm organisation easier with an ES timeframe.
189.25	Dairy Holdings Ltd	Policy 43	Support	Retain
205.20	Dillon Ag Ltd (Chris Dillon)	Policy 43	Oppose	Delete.
206.20	Dillon Ag Ltd (Rochelle Dillon)	Policy 43	Oppose	Delete.
209.23	DIPROSE Dave	Policy 43	Support	Retain.
210.72	Director-General of Conservation	Policy 43	Support in part	<p><u>Amend Policy 43 – Transfer of water permits</u> to read:</p> <p>1. Enable the transfer of water permits to take and use water provided the transfer occurs in the same surface water and groundwater management zone or aquifer, any other abstractor is not adversely affected, and the transfer is consistent with the provisions of this Plan, including the minimum flow and allocation regime.</p> <p>2. Provide for transfer of water permits for groundwater abstraction between groundwater zones or aquifers in the same surface water catchment, provided the transfer does not increase cumulative stream depletion effects <u>in that reach where the take is proposed or result in any minimum flow being breached</u> and effects of the new abstraction are consistent with the provisions of this Plan.</p>
279.49	Forest & Bird NZ	Policy 43	Support	Retain.
381.13	HOLDER Wendy & Tom	Policy 43		ES if unable to reassess all water permits should meter and charge a rate for water used. This will ensure efficient use, no wastage and costs to the source of use.
414.8	Irrigation NZ Incorporated	Policy 43	Support	Retain.
749.67	Southland Conservation Board	Policy 43		The Board is a statutory body which should be consulted on matters within its authority and jurisdiction.
752.83	Southland Fish & Game Council	Policy 43	Support Amend	<p>Amend Policy 43 to provide:</p> <p><b>“Transfer of water permits</b></p> <p>1. Enable the transfer of water permits to take and use water provided:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(a) The transfer occurs in the same surface water and groundwater management zone or aquifer, any other abstractor is not adversely affected, and the transfer is consistent with the provisions of this Plan, including the minimum flow and allocation regime; <u>and</u></p> <p>(b) <u>The transfer does not increase cumulative nutrient leaching effects, and the transfer is consistent with the provisions of this Plan, including ground and surface water quality provisions.</u></p> <p>2. Provide for transfer of water permits for groundwater abstraction between groundwater zones or aquifers in the same surface water catchment, provided:</p> <p>(a) The transfer does not increase cumulative stream depletion effects <u>in the reach where the take is proposed or result in the minimum flow being breach</u> and effects of the new abstraction are consistent with the provisions of this Plan; <u>and</u></p> <p>(b) <u>The transfer does not increase cumulative nutrient leaching effects, and the transfer is consistent with the provisions of this Plan, including ground and surface water quality provisions.”</u></p>
877.33	WILSON Aaron	Policy 43	Support	Retain.
880.39	WILSON Shannon	Policy 43	Support	Retain.

#### Policy 44 – Implementing Te Mana o te Wai

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.64	Aratiatia Livestock Ltd	Policy 44	Support	Retain.
108.59	BYTHELL Jesse	Policy 44	Support	Retain.
181.4	CRUICKSHANK Peter & Liz	Policy 44		Amend to allow deviations due to existing rights.
241.2	Egg Producers Federation of NZ (EPFNZ)	Policy 44	Support	Retain.
265.62	Federated Farmers of NZ	Policy 44	Oppose in	Delete Policy 5 and replace with the following:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Southland Province)		part	<u>The catchment limit-setting process recognises and provides for all of the following:</u> <ul style="list-style-type: none"> <li>- <u>Te mana o te wai;</u></li> <li>- <u>The NPS-FM national objectives framework;</u></li> <li>- <u>The need to use land and freshwater resources for drinking water, primary production, commercial and industrial activities; and</u></li> <li>- <u>The ecological, recreational, aesthetic and amenity values of lakes, rivers, hapua and wetlands.</u></li> </ul>
279.50	Forest & Bird NZ	Policy 44	Support	Retain.
749.68	Southland Conservation Board	Policy 44	Amend	Amend Policy 44 (first bullet point) to clarify as follows: Fiordland and the islands ( <u>define which islands</u> ).
752.84	Southland Fish & Game Council	Policy 44	Support	Retain.
797.29	Nga Runanga and TRONT	Policy 44	Support	Retain.
832.59	VAN GOOL Raewyn	Policy 44	Support	Retain.
877.34	WILSON Aaron	Policy 44	Support in part.	Iwi and ES special relationship 9 values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
880.40	WILSON Shannon	Policy 44	Support in part	I support in part these policies but: Council and the W&L plan needs to clarify the limit setting process method of community engagement. Iwi and Environment Southland's special relationship values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
895.40	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 44	Support	Retain but provide an explanatory note to clarify how the provisions for these Freshwater Management Units will be developed and how stakeholders will have an opportunity to participate in the process.

#### Policy 45 – Priority of FMU policies and rules

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.65	Aratiatia Livestock Ltd	Policy 45	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.28	Ballance Agri-Nutrients	Policy 45	Support	Retain.
62.5	Beef + Lamb NZ	Policy 45	Clarify	Clarify whether the FMU limit setting process will cause changes to the Water and Land Plan and ensure that FMU policies and methods can be catchment specific and override region wide rules that may apply to that catchment.
108.60	BYTHELL Jesse	Policy 45	Support	Retain but I seek clarification whether a community and/or Ngai Tahu seeking section-specific objectives and policies means sub-catchments within a Freshwater Management Unit (FMU) could aspire to higher standard than those set for the broader FMU. For example could the community and/or Ngai Tahu seek higher standards for the Pourakino Catchment than those which might be set for the Aparima FMU?
139.4	CLARKE David	Policy 45		The Matura Catchment should be split up into two if not three areas. Perhaps from Gore to the Coast as the physiographics and climate are all similar.
181.5	CRUICKSHANK Peter & Liz	Policy 45		Amend to allow deviations due to existing rights.
198.1	DIACK Hugh	Policy 45	Oppose	Amend to allow sub-catchments to be formed.
241.3	Egg Producers Federation of NZ (EPFNZ)	Policy 45	Support	Retain.
265.63	Federated Farmers of NZ (Southland Province)	Policy 45	Support in part	Amend as follows: In response to Ngāi Tahu and community aspirations and local water quality and quantity issues, FMU sections may include <del>additional</del> catchment-specific <u>values, objectives, and policies, rules, and standards</u> . These FMU <del>objectives and policies</del> <u>provisions</u> will be read and considered together with the region-wide <del>objectives and policies</del> <u>provisions</u> . Any <u>objective, policy, rule, or standard</u> on the same subject matter in the relevant FMU section of this Plan prevails over the relevant <del>policy provisions</del> within the Regional <del>Policies</del> <u>Wide Section</u> , unless it is explicitly stated to the contrary.  As the FMU sections of this Plan are developed in a specific geographical area, FMU sections will not make any changes to the region-wide objectives or policies <del>and will not deviate from the structure and methodology outlined in these Process Policies.</del>
277.38	Fonterra Co-operative Group Ltd	Policy 45	Support in part	Amend Policy 45 as follows: “Policy 45 – Priority of FMU policies and rules 1. In response to Ngāi Tahu and community aspirations and local water quality and quantity issues, FMU sections may include additional catchment-specific objectives and policies. These FMU objectives and policies will be read and considered together with the region-



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>wide objectives and policies. Any policy on the same subject matter in the relevant FMU section of this Plan prevails over the relevant policy within this Regional Policies Section, unless it is explicitly stated to the contrary.</p> <p>As the FMU sections of this Plan are developed in a specific geographical area, FMU sections <del>will not</del> <u>may make any result in</u> changes to the region-wide objectives or policies <del>and will not deviate from the structure and methodology outlined in these Process Policies.</del> <u>Any such changes will enable input from the wider community.”</u></p> <p><del>Note: As the FMU sections are developed in a specific geographical area, it is unfair if changes are made to Region-wide objectives and policies, which apply in other parts of Southland, without the involvement of those wider communities.</del></p>
279.51	Forest & Bird NZ	Policy 45	Support with minor amendment	In response to Ngāi Tahu and community aspirations and local water quality and quantity issues, FMU sections may include additional catchment-specific objectives and policies. These FMU objectives and policies will be read and considered together with the region-wide objectives and policies. Any policy on the same subject matter in the relevant FMU section of this Plan prevails over the relevant policy within this Regional Policies Section, unless it is explicitly stated to the contrary <u>and provided that they are not more lenient/less protective of water quality/quantity/aquatic ecology than the region-wide provisions.</u>
390.19	Horticulture NZ	Policy 45	Support in part	Ensure that values are established in the FMU process and not prescribed in the region wide section of the Plan.
489.1	MACDONALD J C & A H	Policy 45	Amend	Catchments with no dairy or minimal should have different structure and methodology.
640.28	Pourakino Catchment Group	Policy 45	Amend	We question whether the FMU outlined in Policy 45 (1) should be further devolved to specific geographical areas or sub-catchments such as the Pourakino Valley. Amend Plan to provide for the use of lower order FMU at a more localised level.
661.30	Ravensdown Ltd	Policy 45	Support	Ravensdown seeks for Policy 45 to be retained as written, while changing the policy heading to read: “Priority of FMU Objectives and Policies”.
678.1	ROBINSON Jeffrey	Policy 45		Amend Plan to provide for the use of lower order FMU at a more localised level.
679.1	ROBINSON Michael	Policy 45		Amend plan to provide for the use of lower order FMU at a more localised level.
712.24	Seaview Trust & Oraka Farms Ltd	Policy 45	Support	Retain.
749.69	Southland Conservation Board	Policy 45	Amend	Amend Policy 45 (first bullet point) to clarify as follows: Fiordland and the islands ( <u>define which islands</u> ).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.85	Southland Fish & Game Council	Policy 45	Support Amend	<p>Amend Policy 45 as notified with the following amendment:</p> <p>“In response to Ngāi Tahu and community aspirations and local water quality and quantity issues, FMU sections may include additional catchment-specific objectives and policies. These FMU objectives and policies will be read and considered together with the region-wide objectives and policies. Any policy on the same subject matter in the relevant FMU section of this Plan prevails over the relevant policy within this Regional Policies Section, unless it is explicitly stated to the contrary <u>and provided that they are not more lenient or less protective of water, quantity or aquatic ecology than the region wide provisions of the Plan.</u></p> <p>As the FMU sections of this Plan are developed in a specific geographical area, FMU sections will not make any changes to the region-wide objectives or policies and will not deviate from the structure and methodology outlined in these Process Policies.</p>
803.30	The Fertiliser Association of NZ	Policy 45	Support in part Amend	<p>Amend Policy 45 to provide for the introduction at the FMU level, of water quality limits and targets to be implemented using region wide rules and policies as follows:</p> <p>1. In response to Ngāi Tahu and community aspirations and local water quality and quantity issues, FMU sections may include additional catchment-specific objectives <u>as well as values and attributes and policies.</u> These FMU objectives <del>and policies</del> <u>will be achieved through limits and methods but should be</u> read and considered together with the region-wide objectives and policies <u>and rules.</u> <del>Any policy on the same subject matter in the relevant FMU section of this Plan prevails over the relevant policy within this Regional Policies Section, unless it is explicitly stated to the contrary.</del></p> <p>As the FMU sections of this Plan are developed in a specific geographical area, FMU sections will not make any changes to the region-wide objectives or policies <u>or rules</u> and will not deviate from the structure and methodology outlined in these Process Policies.</p>
810.28	Three Rivers Catchment Group (TRCG)	Policy 45		Amend Plan to provide for the use of lower order FMU at a more localised level. We question whether the FMU outlined in Policy 45 (1) should be further devolved to specific geographical areas or sub-catchments.
816.2	TIPPETT Christie	Policy 45	Amend	Amend Plan to provide for the use of lower order FMU at a more localised level.
832.60	VAN GOOL Raewyn	Policy 45	Support	Retain.
877.35	WILSON Aaron	Policy 45	Support in part.	Iwi and ES special relationship 9 values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				collaborative process.
880.41	WILSON Shannon	Policy 45	Support in part	I support in part these policies but: Council and the W&L plan needs to clarify the limit setting process method of community engagement. Iwi and Environment Southland's special relationship values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
895.41	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 45	Support	Retain but provide an explanatory note to clarify how the provisions for these Freshwater Management Units will be developed and how stakeholders will have an opportunity to participate in the process.

### Policy 46 – Identified FMUs

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.66	Aratiatia Livestock Ltd	Policy 46	Support	Retain.
26.7	Ardoyne Farm Dairys	Policy 46	Oppose	Existing catchments are too large and need to be reviewed into smaller units.
43.4	BAKER Shane & SHAW Wendy	Policy 46		Grindstone Creek catchment should be recognised as a separate catchment.
54.6	Bayswater Dairy Ltd	Policy 46	Support Amend	Review the current FMUs and split these into smaller sub-catchments that will be more effective and representative as we proceed into the limit setting process.
159.1	COLLING Leigh	Policy 46	Amend	We would like the Pourakino catchment area to be on its own as this is a different area with no towns affecting our water.
181.6	CRUICKSHANK Peter & Liz	Policy 46		Amend to allow deviations due to existing rights.
209.24	DIPROSE Dave	Policy 46	Oppose	To consider smaller catchments within the fresh water management zones.
241.4	Egg Producers Federation of NZ (EPFNZ)	Policy 46	Support	Retain.
279.52	Forest & Bird NZ	Policy 46	Support with minor amendment	Add Waituna as a FMU and amend map series 7 accordingly.
335.3	GREER Robin	Policy 46	Amend	Amend to establish a sub-catchment approach, it would be more effective and could empower

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				local farmers to address water quality issues within their communities.
339.6	GUNN Olivia	Policy 46	Oppose	We recommend that ES review the current FMUs and split these into smaller sub-catchments that will be more effective and representative as we proceed into the limit setting process.
355.6	HARRIS David	Policy 46		Revisit the FMU system and significantly reduce time frame for limit setting.
361.6	HBG AgriLimited	Policy 46	Support Amend	Review the current FMUs and develop smaller sub-catchments that will be more effective and representative as we proceed into the limit setting process.
386.6	Hopcroft Farms Ltd	Policy 46	Oppose	I recommend a review of the Freshwater Management Units so the limit setting process can be effective and representative for sub catchments as we proceed toward the limit setting process.
437.17	KEMPTHORNE Robert	Policy 46	Oppose in part	Waiau FMU map and all supporting documentation must be changed to reflect true catchment movement of water.
451.5	Knockinnon Farm Trust	Policy 46	Amend	Retain, ensure sub-catchment representation as we proceed toward the limit setting process.
478.16	LOVERIDGE David	Policy 46	Oppose	I believe these should be sub catchments as we proceed towards limit setting.
482.9	Lower Aparima Catchment Group	Policy 46	Oppose	We recommend a review of the Freshwater Management Units so the limit setting process can be effective and representative for sub catchments as we proceed toward the limit setting process.
489.2	MACDONALD J C & A H	Policy 46	Oppose Amend	In Southland there are at least 25 waterways by my count, that's how many FMU's there has to be.
562.9	Meridian Energy Ltd	Policy 46	Oppose in part	Amend Policy 46 to read: Policy 46– Identified FMUs The FMU Sections of this Plan <del>are</del> will generally <u>be</u> based on the following identified Freshwater Management Units for Southland, as shown on Map Series 7: Freshwater Management Units: <ul style="list-style-type: none"> <li>• Fiordland and the islands;</li> <li>• Aparima;</li> <li>• Mataura;</li> <li>• Oreti; and</li> <li>• Waiau</li> </ul> <u>providing where circumstances show that the freshwater objectives and water quality and quantity limits would be better served by establishing smaller FMU's at a sub-catchment level this will be undertaken.</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
564.7	Mid-Aparima Catchment Group	Policy 46	Support Amend	We recommend that ES review the current FMUs and split these into smaller sub-catchments that will be more effective and representative as we proceed into the limit setting process.
661.31	Ravensdown Ltd	Policy 46	Oppose	Ravensdown seeks for Policy 46 to be deleted – the information could be added as a Schedule.
664.18	Real Journeys Ltd	Policy 46		Define “the islands”.
666.11	Rimu Grasslands Ltd & Leicester Downs Ltd	Policy 46	Amend	Please sub-divide these zones. If I consider the Aparima FMU I would at least break this into: <ul style="list-style-type: none"> <li>- Headwater</li> <li>- Upper Aparima</li> <li>- Lower Aparima</li> <li>- Coastal Aparima</li> </ul>
667.6	Riverfield farms Ltd	Policy 46	Amend	Recommend each FMU area is split into 3 based on Upper, Mid and Lower areas to fairly represent the FMU when proceeding to the limit setting process.
737.14	Smithill Ltd	Policy 46	Oppose	This rule needs to be revised, it should not be in such large catchments and it should be broken down into sub catchments. There should be sub catchment limits in place so that there is a more representative Fresh Water Management Units.
749.70	Southland Conservation Board	Policy 46	Amend	Amend Policy 46 (first bullet point) to clarify as follows: Fiordland and the islands ( <u>define which islands</u> ).
752.86	Southland Fish & Game Council	Policy 46	Support Amend	Retain Policy 46 as notified with the following amendment: “The FMU Sections of this Plan are based on the following identified Freshwater Management Units for Southland, as shown on Map Series 7: Freshwater Management Units: <ul style="list-style-type: none"> <li>• Fiordland and the Islands;</li> <li>• Aparima;</li> <li>• Mataura;</li> <li>• Oreti; <del>and</del></li> <li>• Waiau; <u>and</u></li> <li>• <u>Waituna.*</u></li> </ul> <p>(* denotes a priority catchment for the purposes of sub-regional interim limit setting through the FMU process)</p>
761.7	STALKER Hanna & Callum	Policy 46	Oppose	We recommend that ES review the current FMUs and split these into smaller sub-catchments that will be more effective and representative as we proceed into the limit setting process.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
798.3	TEMPLETON Luke	Policy 46	Oppose	I recommend a review of the Freshwater Management Units so the limit setting process can be effective and representative for sub catchments
799.4	TEMPLETON Peter	Policy 46	Oppose	I recommend a review of the Freshwater Management Units so the limit setting process can be effective and representative for sub catchments.
803.31	The Fertiliser Association of NZ	Policy 46	Oppose Amend	Delete Policy 46 and replace with a schedule.
832.61	VAN GOOL Raewyn	Policy 46	Support	Retain.
861.17	WHITE John Copeland	Policy 46	Oppose	We recommend a review of the Freshwater Management Units so the limit setting process can be effective and representative for sub catchments as we proceed toward the limit setting process.
877.36	WILSON Aaron	Policy 46	Support in part.	Iwi and ES special relationship 9 values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
880.42	WILSON Shannon	Policy 46	Support in part	I support in part these policies but: Council and the W&L plan needs to clarify the limit setting process method of community engagement. Iwi and Environment Southland's special relationship values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
895.42	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 46	Support	Retain but provide an explanatory note to clarify how the provisions for these Freshwater Management Units will be developed and how stakeholders will have an opportunity to participate in the process.

### Policy 47 – FMU processes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.21	Ardel Dairies Ltd	Policy 47	Oppose	Remove rule until full clarification of Ngai Tahu indicators of health are defined.
48.29	Ballance Agri-Nutrients	Policy 47	Support in part	Retain subject to further information and clarification being provided with respect to the Freshwater Management Unit processes, a collaborative approach being employed to establish Freshwater Management Unit provisions and any provisions drafted being based upon substantiated scientific research. Further, an indicative guideline for the Freshwater Management Unit establishment process should be provided within the pSW&LP.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.6	Beef + Lamb NZ	Policy 47	Support in part Amend	Amend Policy 47 to read: “The FMU sections will: 1. establish freshwater objectives for each catchment, having particular regard to the national significance of Te Mana o te Wai, <u>irrigation and stock drinking water needs for production purposes</u> , and any other values developed in accordance with Policies CA1-CA4 and Policy D1 of the National Policy Statement for Freshwater Management 2014; 2. ...”
81.19	BLAKELY Hamish & Hannah	Policy 47		Environment Southland to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.
89.26	BRENTLEIGH Family Trust	Policy 47	Oppose	Delete.
103.5	BYARS A R & L J Trust	Policy 47	Amend	Amend to include a proven testing procedure to determine Ngai Tahu indicators of health.
181.7	CRUICKSHANK Peter & Liz	Policy 47		Amend to allow deviations due to existing rights.
189.26	Dairy Holdings Ltd	Policy 47	Support	Retain
205.21	Dillon Ag Ltd (Chris Dillon)	Policy 47	Oppose	Remove #4 from the plan.
206.21	Dillon Ag Ltd (Rochelle Dillon)	Policy 47	Oppose	Remove #4 from the plan.
210.73	Director-General of Conservation	Policy 47	Support in part	<u>Amend Policy 47 – FMU processes</u> to read: The FMU sections will: 1. establish freshwater objectives for each catchment, having particular regard to the national significance of Te Mana o te Wai, and any other values developed in accordance with Policies CA1-CA4 and Policy D1 of the National Policy Statement for Freshwater Management 2014, <u>and where relevant:</u> a. <u>New Zealand Coastal Policy Statement 2010;</u> b. <u>The purposes for which Crown land managed by the Department of Conservation is held; and</u> c. <u>relevant Management Plans and Strategies prepared under other Acts;</u> 2. set water quality and water quantity limits and targets to achieve the freshwater objectives;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				3. set methods to phase out any over-allocation, within a specified timeframe; and 4. assess water quality and quantity based on Ngāi Tahu indicators of health.
233.2	DYSON Valerie &Glyn	Policy 47	Amend	Add a provision for a collaborative process for the community to have input into the process of limit setting.
241.5	Egg Producers Federation of NZ (EPFNZ)	Policy 47	Support	Retain.
262.1	Fairview Eastern Bush Ltd	Policy 47	Oppose	The size of the farm in stock units should determine the amount of winter crop put in.
265.64	Federated Farmers of NZ (Southland Province)	Policy 47	Support in part	Amend Policy 47 as follows: The FMU sections will: <u>1. undertake a collaborative community process to implement the requirements of the NPS-FM</u> 1. establish freshwater <u>values and objectives</u> for each catchment, having particular regard to the national significance of Te Mana o te Wai, and any other values developed in accordance with Policies CA1-CA4 and Policy D1 of the National Policy Statement for Freshwater Management 2014; 2. set water quality and water quantity limits, <del>and</del> <u>targets, and standards</u> to achieve <u>and monitor</u> the freshwater objectives; 3. set methods to phase out any over-allocation, within a specified timeframe; and 4. assess water quality and quantity based on <del>Ngāi Tahu indicators of health standards in the NPS-FM and additional standards developed following the value and objective setting process.</del>
279.53	Forest & Bird NZ	Policy 47	Support with minor amendment	Add National Coastal Policy Statement, and relevant National Park Management Plans and Conservation Strategies.  Amend to make consistent with Policy CA2 of NPSFM.
355.7	HARRIS David	Policy 47		Revisit the FMU system and significantly reduce time frame for limit setting.
381.14	HOLDER Wendy & Tom	Policy 47(3)		Change to read 'set methods to bring over-allocated consents in line with all consents new, existing and proposed by the date of implementation of this plan.'
390.20	Horticulture NZ	Policy 47	Support in part	Amend Policy 47 by adding a new step 1 and renumber the remaining clauses. <u>1. Identify values for the FMU as set out in Policy 44.</u>
402.4	HUNT Alistair & Bernadette	Policy 47	Amend	Amend Policy 47 provision for a collaborative process for the community to input into the limit



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				setting process.
437.18	KEMPTHORNE Robert	Policy 47	Oppose in part	Amend section 4 to include <u>in conjunction with Nationally recognised water quality standards and indicators from NIWA</u> . Or something else to similar effect.
489.3	MACDONALD J C & A H	Policy 47	Amend	Assess water quality and quantity based on Ngai Tahu indicators of health is all that is required.
562.10	Meridian Energy Ltd	Policy 47	Oppose in part	Amend Policy 47 to read: Policy 47 – FMU processes The FMU Sections will: 1) establish fresh water objectives for each catchment <u>or sub catchment</u> , having particular regard to the national significance of Te Mana o te Wai, and any other values developed in accordance with Policies CA1-CA4 and Policy D1 of the National Policy Statement for Freshwater Management 2014; 2) set water quality and water quantity limits and targets to achieve the fresh water objectives; 3) set methods to phase out any over-allocation, within a specified timeframe; and 4) assess water quality and quantity based on Ngai Tahu indicators of health.
584.1	Moss Lane Ltd	Policy 47	Amend	Have a plan to allow cultivating on 20-25 degree slopes at dry season periods, with grass to grass sowing (not crops).
661.32	Ravensdown Ltd	Policy 47	Support	Retain.
712.25	Seaview Trust & Oraka Farms Ltd	Policy 47	Support	Retain.
720.1	SHAW Robert	Policy 47	Amend	Would like to see cultivated land calculated as a percentage of land owned e.g. 25%
749.71	Southland Conservation Board	Policy 47	Amend	Amend Policy 46 (first bullet point) to clarify as follows: Fiordland and the islands ( <u>define which islands</u> ).
752.87	Southland Fish & Game Council	Policy 47	Support Amend	Retain Policy 47 as notified with the following amendments: <b>“Policy 47 – FMU processes</b> The FMU sections will <u>support the implementation of the region wide objectives by:</u> 1. establishing <u>specific</u> freshwater objectives for each catchment, having particular regard to the national significance of Te Mana o te Wai, and any other values developed in accordance with Policies CA1-CA4 and Policy D1 of the National Policy Statement for Freshwater Management 2014; 2. set water quality and water quantity limits and targets to achieve the <u>region wide and specific</u> freshwater objectives;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				3. set methods to phase out any over-allocation, within a specified timeframe; and 4. assess water quality and quantity based on Ngāi Tahu indicators of health.”
797.30	Nga Runanga and TRONT	Policy 47	Support in part	Retain Policy as worded, and include: <u>5. Where there is evidence of a decline in the health of a waterbody over time an approach must be taken to reduce contaminates, sediments and point source discharges over time.</u>
802.20	The 254 Partnership & Gerken Family Trust	Policy 47	Oppose	Remove #4 from the plan.
803.32	The Fertiliser Association of NZ	Policy 47	Support	Retain.
820.6	TOPHAM Jeanette	Policy 47	Support	Retain.
832.62	VAN GOOL Raewyn	Policy 47	Support	Retain.
877.37	WILSON Aaron	Policy 47	Support in part.	Iwi and ES special relationship 9 values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
880.43	WILSON Shannon	Policy 47	Support in part	I support in part these policies but: Council and the W&L plan needs to clarify the limit setting process method of community engagement. Iwi and Environment Southland’s special relationship values are not to be used as a proxy for local community values. The limit setting process and management of FMUs should be done via a truly collaborative process.
895.43	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Policy 47	Support	Retain but provide an explanatory note to clarify how the provisions for these Freshwater Management Units will be developed and how stakeholders will have an opportunity to participate in the process.

### New policy required

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.24	Alliance Group Ltd	New policy		Include additional policies recognising and providing for the use of water associated with industries and other infrastructure in the Southland Region which are of regional significance.
180.3	CROOYMANS Ton	New policy	Oppose	Include a policy regarding existing old sheep dips (hundreds of them in Southland).
189.27	Dairy Holdings Ltd	New policy		Include a new policy:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Collectives</u></p> <p><u>[x] Applications for a resource consent to establish a Nutrient User Group shall describe:</u></p> <ol style="list-style-type: none"> <li>a. <u>the procedures and methods for recording nitrogen losses from properties within the Nutrient User Group; and</u></li> <li>b. <u>the methods for redistributing nitrogen losses when a property joins or leaves a Nutrient User Group; and</u></li> <li>c. <u>the annual reporting requirements; and</u></li> </ol> <p><u>how compliance with the actions set out in each Management Plan will be achieved.</u></p>
210.74	Director-General of Conservation	New provision - Statutory context of plan		<p>Include a new section of the Plan after Water Conservation Orders including the following:</p> <p><u>Other Management Plans and Strategies</u></p> <p><u>Approximately 57% of Southland is managed by the Department of Conservation. Activities on these lands and waters are also managed under plans and strategies made pursuant to the National Parks Act 1980, the Conservation Act 1987 and the Reserves Act 1977: Fiordland National Park Management Plan, Rakiura National Park Management Plan and Stewart Island Rakiura Conservation Management Strategy, and a Southland Murihiku Conservation Management Strategy.</u></p> <p><u>A significant part of South West New Zealand is recognised as being internationally significant as part of Te Wāhipounamu South West New Zealand World Heritage Area. This area is recognised among other matters for its pristine water quality.</u></p>
233.3	DYSON Valerie &Glyn	New policy	Support	Add a new policy to manage the impact of urban land use on water quality.
265.65	Federated Farmers of NZ (Southland Province)	New policy	Support	<p>Insert new policy as follows:</p> <p><u>Recognise the importance of water and land use to the economic and social wellbeing of Southland.</u></p>
265.66	Federated Farmers of NZ (Southland Province)	New policy	Support	<p>Insert new policy as follows:</p> <p><u>Allow discharges of contaminants to enable the community to provide for its economic and social wellbeing.</u></p>
265.67	Federated Farmers of NZ (Southland Province)	New policy	Support	<p>Insert new policy as follows:</p> <p><u>Recognise the importance of forage crops during winter to maintain animal health and farm systems, and support winter grazing practices which minimise the potential for pugging, sediment run-off and associated effects on soil structure and freshwater quality.</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.68	Federated Farmers of NZ (Southland Province)	New policy	Support	Insert new policy as follows: <u>Recognise the importance of land drainage for improving soil structure, plant growth and nutrient uptake, and encourage a holistic approach to land drainage and contaminant management as part of farm environment plans.</u>
265.69	Federated Farmers of NZ (Southland Province)	New policy	Support	Add a new Policy to manage the impact of urban land use on the environment. Include a new Policy entitled, “Urban activities that affect water quality” to address the impacts that urban land use has on water quality.
265.70	Federated Farmers of NZ (Southland Province)	New policy	Support	<u>Policy X</u> <u>Environment Southland will work to drive engagement and collaboration with landowners, iwi, and communities through the planning and management of freshwater.</u>
265.71	Federated Farmers of NZ (Southland Province)	New policy	Support	<u>Policy X</u> <u>Environment Southland in collaboration with landowners, iwi, and communities develop a package of effective non-regulatory methods aimed at improving water quality. These could include:</u> <ul style="list-style-type: none"> <li>• <u>Provision of information about water quality and quantity issues in each catchment;</u></li> <li>• <u>Demonstration projects and case studies;</u></li> <li>• <u>Provision of advice and information at a farm/property or activity scale, where applicable in conjunction with industry organisations, on improving water quality;</u></li> </ul> <u>Financial assistance programmes for environmental infrastructure such as riparian retirement, wetland protection and development and restoration of priority waterways.</u>
277.39	Fonterra Co-operative Group Ltd	New policy	Support	Add a new policy as follows: <u>“When considering the nature, extent and probability of adverse effects of activities with potential adverse effects on water quality, have regard to:</u> <u>(a) the risks of effect inherent in the applicable physiographic zone; or</u> <u>where there is evidence that the site to which the application relates has attributes that are more representative of an alternative physiographic zone, the risks inherent in that alternative physiographic zone.”</u>
277.40	Fonterra Co-operative Group Ltd	New policy – 16A	Support	Insert a new Policy 16A as follows: “Policy 16A – Industrial and trade processes that affect water quality <u>Minimising the environmental effects (including on the quality of water in rivers, coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and groundwater) by requiring the adoption of the best practicable option to manage the treatment and discharge of contaminants</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>derived from industrial and trade processes.”</u>
279.54	Forest & Bird NZ	New policy		Insert a new policy that <u>includes the identifies the relevant S6 preserve and protection requirements.</u>
279.55	Forest & Bird NZ	New policy – need a new policy to follow Policy 15	Support with minor amendment	Insert new policy to follow Policy 15: <u>In implementing Policy 15(2) set as an interim target 10% improvement in water quality every decade until specific freshwater objectives and associated targets and time frames are established.</u>
288.28	Fulton Hogan Ltd & Southern Aggregates Ltd	New policy		Include a new policy that provides for small water abstractions : <u>NEW Policy X - Construction Water Takes</u> <u>Provide for the abstraction of water at a rate not exceeding 5L/s or 100m<sup>3</sup> per day for a period no longer than 6 months for associated with construction activities.</u>
330.10	Gore District Council, Invercargill City Council and Southland District Council	New policy		A new Region-wide Policy is inserted as follows: <b><u>Policy B – Critical Infrastructure</u></b> <u>The development, operation and maintenance of critical infrastructure:</u> <ol style="list-style-type: none"> <li>1. <u>follows good environmental practice;</u></li> <li>2. <u>recognises operational and technical constraints;</u></li> <li>3. <u>provides for social, cultural, economic and environmental well-being of communities, including their health and safety; and</u></li> </ol> <u>avoids, remedies or mitigates any adverse environmental effects on the receiving catchment where practicable.</u>
402.5	HUNT Alistair & Bernadette	New policy	Support	Add a new policy to manage the impact of urban land use on water quality.
402.6	HUNT Alistair & Bernadette	New policy	Support	Add a policy which recognises the role and importance or non-regulatory measures in the maintenance of water quality.
408.1	Hynds Pipe Systems Ltd	New policy		Add new Policy: <u>Recognise the capital investment made in existing farm infrastructure and the social and economic benefits that arise from this infrastructure.</u>
410.9	Invercargill Airport Ltd	New policy		IAL submits that a new policy or policies are required in order to have appropriate regard to the potential adverse effects on existing physical resources arising from discharges to land and/or land use changes.
465.2	Lankirk Trust	New policy		That additional Objective(s) and Policy statements be included which recommend that the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Council and its officers consider and give weight to the economic costs and benefits of activities which impact land, water and air, along with the direct and indirect financial and social effects of any proposed or actual rules on the people, businesses and communities that are affected.
483.15	Ludell Ltd	New policy	Support	Suggest Environment Southland must consider the financial, economic and social repercussions to Southland of implementing policy to achieve water quality.
570.10	MILLER R L & S J Farm Trust	New policy	Oppose in part	ES needs to write a policy that specifically relates to urban areas, that defines urban areas as towns (so that they don't get included in rural statistics).
583.18	MOSEBY Ryan	New policy		Add a new policy to recognise the existing capital investment made in farm infrastructure and consideration of this being taken into account with resource consent applications.
611.7	NZ Defence Force	New Policy	Amend	NZDF requests that a new policy be added as follows: <u>“Policy XX – Water abstraction for temporary military training activities</u> <u>Recognise the need for, and assign priority to, the provision of water for temporary military training activities and NZDF facilities when allocating water.”</u>
640.29	Pourakino Catchment Group	New policy		<u>New Policy - Recognise the capital investment made in existing farm infrastructure and the social and economic benefits that arise from this infrastructure.</u>
640.30	Pourakino Catchment Group	New policy		New Policy- <u>Enable community involvement and participation in freshwater and land management through collaboration with Catchment Groups.</u>
640.31	Pourakino Catchment Group	New policy		New Policy - <u>Recognise that use and development of Southland's rural land resource enables people and communities to provide for their social, economic and cultural wellbeing.</u>
647.2	Progressive Engineering Southland Ltd	New policy		Add new Policy: <u>Recognise the capital investment made in existing farm infrastructure and the social and economic benefits that arise from this infrastructure.</u>
647.3	Progressive Engineering Southland Ltd	New policy		Add new Policy: <u>When considering resource consent applications and determining the term of resource consents recognise good management practices already implemented on farm.</u>
678.2	ROBINSON Jeffrey	New policy		Insertion of a policy that acknowledges the financial investment that farmers have made on their farm when making decisions on resource consent applications.
679.2	ROBINSON Michael	New policy		Insertion of a policy that acknowledges the financial investment that farmers have made on their farm when making decisions on resource consent applications
710.4	Schrader Mains Ltd	New policy		New Policy 19 to support Objective 2: <u>“Provide for farming activities that enable economic,</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>social and cultural wellbeing.”</u>
710.5	Schrader Mains Ltd	New policy		New Policy 17: Assessment of resource consents for new or expanding dairy farming of cows or intensive winter grazing. When considering an application for consent to establish new or expanding dairy farming of cows or intensive winter grazing have regard to: <ul style="list-style-type: none"> <li>(a) The sensitivity of the receiving environment;</li> <li>(b) Whether the receiving environment is over-allocated;</li> <li>(c) The Good Management Practices to be implemented;</li> <li>(d) The effects, including cumulative effects, on water quality;</li> <li>(e) The value of investment in infrastructure;</li> <li>(f) Whether the consent will improve economic, social and cultural wellbeing.</li> </ul>
711.5	SCOTT G D & M M	New policy		Recognise the existing capital investment made in farm infrastructure and consideration of this being taken into account with resource consent applications.
752.88	Southland Fish & Game Council	New policy		Insert a new policy as follows: <b><u>“Instigate appropriate water conservation measures</u></b> <u>Instigate appropriate water conservation procedures at times of low flow, including:</u> <ul style="list-style-type: none"> <li>1. <u>Advise abstractors to conserve water and limit non-essential use of water as far as practicable;</u></li> <li>2. <u>Other than for the Waiau River at the Manapouri Lake Control Structure, implement a one-to-one flow sharing regime when flows reach the sum of the minimum flow or level and the total volume of water allocated through current resource consents<sup>5</sup> for the relevant surface water body. Methods to achieve this include, but are not limited to:</u> <ul style="list-style-type: none"> <li>(a) <u>rationing;</u></li> <li>(b) <u>rostering; and</u></li> <li>(c) <u>the use of water user groups;</u></li> </ul> </li> <li>3. <u>Require consent holders to cease abstraction in accordance with the minimum flows/levels</u></li> </ul>

<sup>5</sup> Including the stream depletion effect of each consented groundwater abstraction greater than 2 litres per second with a direct, high or moderate degree of hydraulic connection in accordance with Policy 23 “Stream Depletion Effects” set out in the pWLP.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>specified as conditions of their resource consents; and</u> 4. <u>In extreme situations, consider the need to issue a water shortage direction.”</u>
752.89	Southland Fish & Game Council	New policy	Support in part	Insert new policy providing: <u>The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the <b>Peat Wetlands</b> physiographic unit is a prohibited activity.</u>
792.17	TAYLER Matthew	New Policy		Policy/rule needs added allowing landowners to contest classification, consisting of a) landowner notifies council of inaccuracies; b) council arranges (and pays for) independent verification (ground-proofing); c) if found correct, classification stands; d) if incorrect, ES amends maps/plans.
810.29	Three Rivers Catchment Group (TRCG)	New policy		<u>New Policy - Recognise that use and development of Southland’s rural land resource enables people and communities to provide for their social, economic and cultural wellbeing.</u>
810.30	Three Rivers Catchment Group (TRCG)	New policy		<u>New Policy - Recognise the capital investment made in existing farm infrastructure and the social and economic benefits that arise from this infrastructure.</u>
816.3	TIPPETT Christie	New policy		Insertion of a policy that acknowledges the financial investment that farmers have made on their farm when making decisions on resource consent applications.
877.38	WILSON Aaron	New policy	Support in part	The Water and Land Plan needs to describe how the limit setting process will take place and under what method the wider community will be involved in this process. I encourage council to adopt the collaborative approach to the limit setting process.
877.39	WILSON Aaron	New policy	Support in part	The Water and Land Plan needs to outline a mechanism with which iwi values and wider community values are found or ascribed through a collaborative process.
895.44	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	New policy		Ensure that there is an appropriate policy framework for the management of contaminated land. This could be achieved by including an enabling policy to support the assessment of contaminated land. The following is proposed but alternative wording may achieve similar outcomes: <b><u>Policy X – Assess land contaminated by a hazardous substance</u></b> <u>Assess the environmental risk of a discharge from land contaminated by a hazardous substance by using guideline values that are appropriate to the discharge and the site.</u>
897.1	TNZ Growing Products Ltd	New policy		<u>New Policy 33A – Other wetlands</u> <u>Recognise that modification of wetland not identified as regionally significant may be appropriate where adverse effects can be avoided, remedied or mitigated.</u>



## General Comments - Rules

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.22	Ardel Dairies Ltd	Consent classification	Oppose	Lower the upper classifications of consents.
73.10	BLACK Family Trust	General	Oppose	Include a rule that states that Environment Southland funds and carries out individual investigations where the landowner disagrees with the classification of the physiographic zones and prove the zoning to be correct. Any zones that are proven incorrect are amended accordingly.
110.2	C P M Environmental	Region wide Rules	Neutral	I would seek that the plan has clear provision for new/innovative techniques in land and water to be considered under an “alternative solutions” that in theory, (then monitoring) can show that they achieve compliance.
189.28	Dairy Holdings Ltd	General		Simplify the rules regime where possible. No specific decision requested.
265.72	Federated Farmers of NZ (Southland Province)	General		Amend the rules to provide for the unique circumstances of hill and high country farms, specifically by allowing wintering as a permitted activity.
265.73	Federated Farmers of NZ (Southland Province)	General	Oppose in part	Amend the Rules so that permitted activities are at the beginning of each section.
518.6	MCDONALD Stuart & HALDER Robyn	General		Some ‘rules’ could be included to aid in this Policy implementation. Give the farmer some discretion please and acknowledge his ‘hands on’ management, coping with everyday issues, given that most environmental challenges arise during weather extremes.
752.90	Southland Fish & Game Council	Region wide Rules	Support	Region Wide Rules not covered specifically below are supported by Fish & Game. Fish & Game seeks that they are retained as notified. Land Use Rules not covered specifically below are supported by Fish & Game. Fish & Game seeks that they are retained as set out in the pWLP.
752.91	Southland Fish & Game Council	General	Oppose	Amend any permitted activity rule in the pWLP that permits a discharge to either an alternative activity status and include such matters of control or discretion necessary to control any actual or potential effect of the activity <b>or</b> include additional measurable and enforceable numerical permitted activity standards to ensure that compliance with the permitted activity rule meets the requirements of s 70.  If amending the activity status of any rules, Council should be able to meet its obligations under s 107 of the RMA. Therefore controlled activity status may not be appropriate in all cases.
752.92	Southland Fish & Game Council	General	Oppose	Insert the words “ <u>and their margins</u> ” throughout the pWLP wherever provisions are referring to the management of wetland, river and / or lake beds, e.g. “lakes, rivers <u>and their margins.</u> ”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
797.31	Nga Runanga and TRONT	General	Support	Unless specific changes are sought retain rules as worded.

### Region wide rules - Rule 1

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.67	Aratiatia Livestock Ltd	Rule 1	Support	Retain.
108.61	BYTHELL Jesse	Rule 1	Support	Retain.
181.8	CRUICKSHANK Peter & Liz	Rule 1		Delete.
210.75	Director-General of Conservation	Rule 1	Support	Retain.
279.56	Forest & Bird NZ	Rule 1	Support	Retain.
449.14	KiwiRail Holdings Ltd (KiwiRail)	Rule 1	Oppose	Remove Rule 1 and include in an Introduction of Plan Commentary text.
574.1	MITCHELL G B & M D	Rule 1	Amend	Amend so the physiographic zones apply when science guarantees where these areas are.
614.12	NZ Transport Agency	Rule 1	Support Amend	Amend so this is no longer a Rule as follows: <del>Rule 1</del> <u>Interpretation Note 1</u>
752.93	Southland Fish & Game Council	Rule 1	Support	Retain.
817.2	Tomogalak Gorge Trust (Jeffery Keen)	Rule 1	Support	Retain
818.2	Tomogalak Gorge Trust (John Keen)	Rule 1	Support	Retain.
819.2	Tomogalak Gorge Trust (Linzi Keen)	Rule 1	Support	Retain.
832.63	VAN GOOL Raewyn	Rule 1	Support	Retain.
895.45	Z Energy, BP Oil NZ &	Rule 1	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Mobil Oil NZ (Oil Companies)			

### Region wide rules - Rule 2

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.68	Aratiatia Livestock Ltd	Rule 2	Support	Retain.
108.62	BYTHELL Jesse	Rule 2	Support	Retain.
181.9	CRUICKSHANK Peter & Liz	Rule 2		Delete.
210.76	Director-General of Conservation	Rule 2	Support	Retain.
279.57	Forest & Bird NZ	Rule 2	Support with minor amendment	Amend Rule 2 as follows: Any rule on the same subject matter in the relevant FMU section of this Plan prevails over the relevant rule within the Regional Rules Section, unless it is explicitly stated to the contrary in any applicable rule in this Plan <u>and provided that they are not more lenient/less protective of water quality/quantity/aquatic ecology than the region-wide provisions..</u>
614.13	NZ Transport Agency	Rule 2	Support Amend	Amend so this is no longer a Rule as follows:  <del>Rule 1</del> <u>Interpretation Note 2</u>
752.94	Southland Fish & Game Council	Rule 2	Support	Retain.
777.3	STRATFORD Chris & Lynsey	Rule 2	Neutral	We believe there should be provision made for this situation if it would result in a consent period of less than 5 years e.g. your current resource consent automatically rolls over on the same conditions, until the FMU process outcomes are known and you can reapply. The costs of the roll over should be reasonable. Does Environment Southland have the resourcing to deal with the multiple consent applications that will be triggered once the FMU process is concluded?
803.33	The Fertiliser Association of	Rule 2	Oppose	Delete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	NZ			
817.3	Tomogalak Gorge Trust (Jeffery Keen)	Rule 2	Support	Retain
818.3	Tomogalak Gorge Trust (John Keen)	Rule 2	Support	Retain.
819.3	Tomogalak Gorge Trust (Linzi Keen)	Rule 2	Support	Retain.
832.64	VAN GOOL Raewyn	Rule 2	Support	Retain.
895.46	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 2	Support	Retain.

### Region wide rules - Rule 3

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.69	Aratiatia Livestock Ltd	Rule 3	Support	Retain.
108.63	BYTHELL Jesse	Rule 3	Support	Retain.
181.10	CRUICKSHANK Peter & Liz	Rule 3		Delete.
210.77	Director-General of Conservation	Rule 3	Support	Retain.
279.58	Forest & Bird NZ	Rule 3	Support	Retain.
288.29	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 3	Oppose	Amend Rule 3 to: Rule 3 When considering applications for controlled activities or restricted discretionary activities, in addition to the matters over which: (a) control is reserved; or (b) exercise of discretion is restricted;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				the decision-maker may also consider the <u>positive effects of the proposal</u> , lapse period sought, the duration of the resource consent sought, the review of the conditions of a resource consent, the need for a bond and the collection, recording, monitoring and provision of information concerning the exercise of a resource consent.
449.15	KiwiRail Holdings Ltd (KiwiRail)	Rule 3	Oppose	Remove Rule 3 and include in the Introduction text as a Plan commentary.
614.14	NZ Transport Agency	Rule 3		Delete.
752.95	Southland Fish & Game Council	Rule 3	Support	Retain.
817.4	Tomogalak Gorge Trust (Jeffery Keen)	Rule 3	Support	Retain
818.4	Tomogalak Gorge Trust (John Keen)	Rule 3	Support	Retain.
819.4	Tomogalak Gorge Trust (Linzi Keen)	Rule 3	Support	Retain.
832.65	VAN GOOL Raewyn	Rule 3	Support	Retain.
895.47	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 3	Support	Retain.

#### Region wide rules - Rule 4

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.70	Aratiatia Livestock Ltd	Rule 4	Support	Retain.
108.64	BYTHELL Jesse	Rule 4	Support	Retain.
181.11	CRUICKSHANK Peter & Liz	Rule 4		Delete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.78	Director-General of Conservation	Rule 4	Support	Retain.
279.59	Forest & Bird NZ	Rule 4	Support	Retain.
449.16	KiwiRail Holdings Ltd (KiwiRail)	Rule 4	Oppose	Delete.
473.1	LINDSAY Ray	Rule 4	Support	Support until other tools are found.
614.15	NZ Transport Agency	Rule 4	Support	Retain.
640.32	Pourakino Catchment Group	Rule 4	Support	Retain.
752.96	Southland Fish & Game Council	Rule 4	Support	Retain.
810.31	Three Rivers Catchment Group (TRCG)	Rule 4	Support	Retain.
817.5	Tomogalak Gorge Trust (Jeffery Keen)	Rule 4	Support	Retain
818.5	Tomogalak Gorge Trust (John Keen)	Rule 4	Support	Retain.
819.5	Tomogalak Gorge Trust (Linzi Keen)	Rule 4	Support	Retain.
832.66	VAN GOOL Raewyn	Rule 4	Support	Retain.
895.48	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 4	Support	Retain.

#### Rule 5 – Discharges to surface waterbodies that meet water quality standards

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.25	Alliance Group Ltd	Rule 5	Oppose in	Ensure that the water quality standards set out in Appendix E have been appropriately

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	<p>developed taking into account natural variability, community values and uses, and other relevant water quality guidelines.</p> <p>In the absence of this being demonstrated, adapt the rule such that Appendix E is not used as a “standard” or amend the rule as follows:</p> <p>Except as provided for elsewhere in this Plan the discharge of any:</p> <p>(c) contaminant, or water, into a surface waterbody; or</p> <p>(d) contaminant onto or into land in circumstances where it may enter a surface waterbody; is a <u>restricted</u> discretionary activity provided the following condition is met:</p> <p>(i) the discharge does not <u>cause a reduction in</u> <del>reduce the</del> water quality below any standards set for the relevant waterbody in Appendix E ; Water Quality Standards” at the downstream edge of the reasonable mixing zone; and</p> <p>(ii) The discharge does not contain any raw sewage.</p> <p>Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated</p>
24.71	Aratiatia Livestock Ltd	Rule 5	Support	Retain.
48.30	Ballance Agri-Nutrients	Rule 5	Support in part	Retain subject to clarification whether the rule is intended to address both point and non-point source discharges, and if intended to address non-point source discharges, how sub-clause (I) is to be applied.
108.65	BYTHELL Jesse	Rule 5	Support	Retain.
249.16	Ernslaw One Ltd	Rule 5	Support Amend	Retain Rules 5 to 8 as proposed, subject to Rule 15 encompassing storm water generated in plantation forests. Make an exception to the 80% Dissolved Oxygen limit for plantation forests during and immediately harvest, subject to best endeavours used to minimise the deposition of pine needles in the stream channel.
265.74	Federated Farmers of NZ (Southland Province)	Rule 5	Oppose in part	Amend Rule 5 so that it is clear they apply only to point-source discharges.
279.60	Forest & Bird NZ	Rule 5	Support with minor amendment	Either add a new rule or amend rule 5 to catch activities that might meet the water quality standards, but are to over allocated water ways to make certain they would be non-complying.
355.8	HARRIS David	Rule 5	Amend	Change wording so that the discharge should not cause the levels to be exceeded anywhere

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				downstream of the discharge, taking into account all existing discharges.
381.15	HOLDER Wendy & Tom	Rule 5(a) and (b)		Change (a) and (b) from discretionary activity to non-complying activity.
390.21	Horticulture NZ	Rule 5	Oppose in part	Amend Rule 5 to a Restricted Discretionary activity.
411.23	Invercargill City Council	Rule 5	Oppose	The discharges are classified as a discretionary activity in line with Council's submission on Rules 15 and 33.
562.11	Meridian Energy Ltd	Rule 5	Oppose in part	Amend Rule 5 to read: Rule 5 – Discharges to surface water bodies that meet water quality standards Except as provided for elsewhere in this Plan the discharge of any: (a) contaminant, or water, into a surface waterbody; or (b) contaminant onto or into land in circumstances where it may enter a surface waterbody; is a discretionary activity provided the following condition is met: <u>1.</u> (i) the discharge does not reduce the water quality below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the reasonable mixing zone; and (ii) the discharge does not contain any raw sewage. <u>OR</u> <u>2. The discharge is associated with activities forming part of the Manapouri Power Scheme.</u>
622.14	P F Olsen Ltd	Rule 5	Amend	Either amend rules or definition to provide for a temporal and spatial component to be described in the Water Quality standards especially when dealing in very small streams 0 - < 1m wide. Or explicitly exclude incidental deposition of natural organic materials arising from harvesting operations provided that such depositions meet the same standards as (iv) to (v) of the Discharge to stormwater rule. Or explicitly exclude such material from the definition of a contaminant.
661.33	Ravensdown Ltd	Rule 5	Support in part	Ravensdown seeks the intent of Rule 5 to be retained on the basis that fertiliser application to land where it may enter a surface waterbody is provided for elsewhere in the Plan. Ravensdown seeks clarification on how Rule 5 might apply to a non-point source discharges where a reasonable mixing zone cannot be easily applied to such discharges.
725.3	Silver Fern Farms Ltd	Rule 5	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
750.9	Southland District Council	Rule 5	Amend	Amend to include a specific discretionary activity rule for community sewerage schemes discharging to water (given there is a specific rule for community sewerage schemes discharging to land) OR clarify that the non-complying rule applies where it's the discharge reducing water quality not the existing quality of the surface waterbody that affects the activity status.
752.97	Southland Fish & Game Council	Rule 5	Support	Retain.
797.32	Nga Runanga and TRONT	Rule 5	Support	Retain.
803.34	The Fertiliser Association of NZ	Rule 5	Support	Retain Rule 5 on the condition that fertiliser application to land where it may enter a surface water body is provided for elsewhere in the Plan.
818.6	Tomogalak Gorge Trust (John Keen)	Rule 5	Support	Retain.
819.6	Tomogalak Gorge Trust (Linzi Keen)	Rule 5	Support	Retain.
832.67	VAN GOOL Raewyn	Rule 5	Support	Retain.
895.49	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 5	Support	Retain.

### Rule 6 – Discharges to surface waterbodies that do not meet water quality standards

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.26	Alliance Group Ltd	Rule 6	Oppose	Amend the activity status from non-complying to discretionary. Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated
24.72	Aratiatia Livestock Ltd	Rule 6	Support	Retain.
108.66	BYTHELL Jesse	Rule 6	Support	Retain.
249.17	Ernslaw One Ltd	Rule 6	Support Amend	Retain Rules 5 to 8 as proposed, subject to Rule 15 encompassing storm water generated in plantation forests.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
250.1	ESLER Lloyd	Rule 6		Clarify what the implications of this rule are for the Invercargill City Council when large volumes of runoff enter its drainage systems as a result of heavy rain.
265.75	Federated Farmers of NZ (Southland Province)	Rule 6	Oppose in part	Amend Rule 6 so that it is clear they apply only to point
330.11	Gore District Council, Invercargill City Council and Southland District Council	Rule 6	Support in part	No decision sought unless the Councils' proposed changes to objectives and policies related to critical infrastructure and the proposed amendments to Rule 15 and 33 are not accepted.
390.22	Horticulture NZ	Rule 6	Oppose in part	Amend Rule 6 to a Restricted Discretionary activity.
411.24	Invercargill City Council	Rule 6	Oppose	That the discharges are classified as a discretionary activity in line with Council's submission on Rules 15 and 33.
562.12	Meridian Energy Ltd	Rule 6	Oppose in part	<b>Amend</b> Rule 6 to read: Rule 6 – Discharges to surface water bodies that do not meet water quality standards Except as provided for elsewhere in this Plan the discharge of any: (a) contaminant, or water, into a surface waterbody <u>other than provided for in Rule 5(2)</u> ; or (b) contaminant onto or into land in circumstances where it may enter a surface waterbody that does not meet the conditions in Rule 5(1); is a non-complying activity.
622.15	P F Olsen Ltd	Rule 6	Amend	Either amend rules or definition to provide for a temporal and spatial component to be described in the Water Quality standards especially when dealing in very small streams 0 - < 1m wide. Or explicitly exclude incidental deposition of natural organic materials arising from harvesting operations provided that such depositions meet the same standards as (iv) to (v) of the Discharge to stormwater rule. Or explicitly exclude such material from the definition of a contaminant.
750.10	Southland District Council	Rule 6	Amend	Amend to include a specific discretionary activity rule for community sewerage schemes discharging to water (given there is a specific rule for community sewerage schemes discharging to land) OR clarify that the non-complying rule applies where it's the discharge reducing water quality not the existing quality of the surface waterbody that affects the activity status.
752.98	Southland Fish & Game Council	Rule 6	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
817.6	Tomogalak Gorge Trust (Jeffery Keen)	Rule 6	Support	Retain
818.7	Tomogalak Gorge Trust (John Keen)	Rule 6	Support	Retain.
819.7	Tomogalak Gorge Trust (Linzi Keen)	Rule 6	Support	Retain.
832.68	VAN GOOL Raewyn	Rule 6	Support	Retain.
895.50	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 6	Support	Retain.

#### Rule 7 – Other discharges to water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.27	Alliance Group Ltd	Rule 7	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.73	Aratiatia Livestock Ltd	Rule 7	Support	Retain.
108.67	BYTHELL Jesse	Rule 7	Support	Retain.
249.18	Ernslaw One Ltd	Rule 7	Support Amend	Retain Rules 5 to 8 as proposed, subject to Rule 15 encompassing storm water generated in plantation forests.
265.76	Federated Farmers of NZ (Southland Province)	Rule 7	Oppose in part	Amend Rule 7 so that it is clear they apply only to point
381.16	HOLDER Wendy & Tom	Rule 7		Change to non-complying for new, existing and proposed activity. Restrictions should include any actual decrease in water quality above and below the discharge point.
622.16	P F Olsen Ltd	Rule 7	Amend	Either amend rules or definition to provide for a temporal and spatial component to be described in the Water Quality standards especially when dealing in very small streams 0 - < 1m wide. Or explicitly exclude incidental deposition of natural organic materials arising from harvesting

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				operations provided that such depositions meet the same standards as (iv) to (v) of the Discharge to stormwater rule. Or explicitly exclude such material from the definition of a contaminant.
661.34	Ravensdown Ltd	Rule 7	Amend	Ravensdown seeks for Rule 7 to be amended to read: “Rule 7 - <del>Other</del> Discharges to <u>groundwater</u> Except as provided for elsewhere in the Plan, the discharge of any contaminant or water into <u>groundwater</u> is a discretionary activity.”
752.99	Southland Fish & Game Council	Rule 7	Support	Retain.
803.35	The Fertiliser Association of NZ	Rule 7	Support in part Amend	Amend Rule 7 as follows: Rule 7 – <del>Other</del> Discharges to <u>groundwater</u> Except as provided for elsewhere in the Plan, the discharge of any contaminant or water into <u>groundwater</u> is a discretionary activity. Or in the alternative combine with Rule 5.
817.7	Tomogalak Gorge Trust (Jeffery Keen)	Rule 7	Support	Retain
818.8	Tomogalak Gorge Trust (John Keen)	Rule 7	Support	Retain.
819.8	Tomogalak Gorge Trust (Linzi Keen)	Rule 7	Support	Retain.
832.69	VAN GOOL Raewyn	Rule 7	Support	Retain.
895.51	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 7	Support	Retain.

### Rule 8 – Discharges of surface water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.28	Alliance Group Ltd	Rule 8	Oppose in	Better clarify the relationship and resulting activity status between the various discharge rules.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	Delete rules that are unnecessarily duplicated.
24.74	Aratiatia Livestock Ltd	Rule 8	Support	Retain.
108.68	BYTHELL Jesse	Rule 8	Support	Retain.
189.29	Dairy Holdings Ltd	Rule 8		Amend 8.c.ii as follows: any conspicuous change in visual clarity, <u>except where this arises from natural causes such as heavy rainfall or flooding;</u>
249.19	Ernslaw One Ltd	Rule 8	Support Amend	Retain Rules 5 to 8 as proposed, subject to Rule 15 encompassing storm water generated in plantation forests.
261.1	Fairmount Perendale Stud Farm	Rule 8	Oppose Amend	(c)(i) this clause should be changed to make provisions for any conspicuous change in visual clarity after a determined period that is deemed to be a permanent change in visual clarity and not just a settling period of the initial drainage disturbance.
265.77	Federated Farmers of NZ (Southland Province)	Rule 8	Oppose in part	Amend Rule 8 so that it is clear they apply only to point
279.61	Forest & Bird NZ	Rule 8	Support with minor amendment	Amend to ensure activity status meets NPSFM and NZCPS objectives and where water is over allocated these activities should become non-complying. <u>Add 4.actual or potential effects on water quality, water quantity and natural character.</u>
330.12	Gore District Council, Invercargill City Council and Southland District Council	Rule 8	Oppose Amend	Amend Rule 8 as follows: <b>Rule 8 – Discharges of surface water</b> The discharge of surface water into a surface waterbody or artificial watercourse is a controlled activity provided the following conditions are met: <ul style="list-style-type: none"> <li>a. the discharge was lawfully established prior to 1 January 2010;</li> <li>b. the lawfully established discharge point has not changed; and</li> <li>c. at the downstream edge of the reasonable mixing zone, the discharge does not reduce the water quality of the receiving waters or give rise to any of the following effects in the receiving water: <ul style="list-style-type: none"> <li>i. the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;</li> <li>ii. any conspicuous change in visual clarity;</li> <li>iii. the rendering of freshwater unsuitable for consumption by farm animals; or</li> <li>iv. any significant adverse effects on aquatic life, <del>other than the target species.</del></li> </ul> </li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<b>Environment Southland will restrict the exercise of its control to the following matters:</b> <ol style="list-style-type: none"> <li>1. the potential for flooding of any person's property, as a result of the discharge;</li> <li>2. erosion of the bed or banks of the receiving surface waterbody or artificial watercourse, as a result of the discharge; and</li> <li>3. actual or potential effects on existing water users and aquatic ecosystems.</li> </ol>
390.23	Horticulture NZ	Rule 8	Support in part	Clarify whether Rule 8 applies to both point source and non-point source discharges.
411.25	Invercargill City Council	Rule 8	Oppose	That the rule is amended to be a permitted activity subject to meeting the required standards.
449.17	KiwiRail Holdings Ltd (KiwiRail)	Rule 8		Retain.
562.13	Meridian Energy Ltd	Rule 8	Support	Retain.
622.17	P F Olsen Ltd	Rule 8	Amend	Either amend rules or definition to provide for a temporal and spatial component to be described in the Water Quality standards especially when dealing in very small streams 0 - < 1m wide. Or explicitly exclude incidental deposition of natural organic materials arising from harvesting operations provided that such depositions meet the same standards as (iv) to (v) of the Discharge to stormwater rule. Or explicitly exclude such material from the definition of a contaminant.
750.11	Southland District Council	Rule 8		Clarify what the activity status is if those conditions of the controlled activity are not met.
752.100	Southland Fish & Game Council	Rule 8	Support	Retain.
817.8	Tomogalak Gorge Trust (Jeffery Keen)	Rule 8	Support	Retain
818.9	Tomogalak Gorge Trust (John Keen)	Rule 8	Support	Retain.
819.9	Tomogalak Gorge Trust (Linzi Keen)	Rule 8	Support	Retain.
832.70	VAN GOOL Raewyn	Rule 8	Support	Retain.

## Rule 9 – Discharge of agrichemicals onto or into surface water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.29	Alliance Group Ltd	Rule 9	Oppose in part	<p>Amend Rule 9 as follows:</p> <p>Rule 9 – Discharge agrichemicals onto or into surface water. The discharge of agrichemicals and any associated wetting, antifoaming and antidrift agents and marker dyes, into surface water, is a permitted activity provided the following conditions are met:</p> <p>(a) the discharge is for the purpose of eradicating, modifying or controlling excessive growth of aquatic plants;</p> <p>(b) the agrichemical is approved for aquatic use with New Zealand under the Hazardous Substances and New Organisms Act 1966, <u>and the use and discharge of the substance if in accordance with any and all the conditions of the approval: ...</u></p> <p>(g) <u>the discharge does not occur within the microbial Health Problem protection zone of a drinking water supply site identified Appendix J, or where no such zone is defined than 250 metres of the abstraction point of a drinking water supply site identified in Appendix J.</u></p> <p>Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated</p>
24.75	Aratiatia Livestock Ltd	Rule 9	Support	Retain.
108.69	BYTHELL Jesse	Rule 9	Support	Retain.
152.1	Clover Bell Ltd	Rule 9	Support	Retain.
209.25	DIPROSE Dave	Rule 9	Support	Amendment that record of spray used, date, area sprayed, rate added to appendix N.
210.79	Director-General of Conservation	Rule 9	Support in part	<p>Amend Rule 9 – Discharge of agrichemicals onto or into surface water to read:</p> <p>The discharge of agrichemicals and any associated wetting, antifoaming and anti-drifting agents and marker dyes, into surface water, is a permitted activity provided the following conditions are met:</p> <p>(a) the discharge is for the purpose of eradicating, modifying or controlling excessive growth of aquatic plants, <del>and does not exceed the quantity, concentration or rate necessary, as recommended by the manufacturer;</del></p> <p>(b) the agrichemical is approved for aquatic use within New Zealand under the Hazardous Substances and New Organisms Act 1996;</p> <p>(c) all practicable measures are taken to minimise spray drift beyond the target area;</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(d) the discharge does not give rise to any of the following effects in the receiving water:</p> <p>(i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;</p> <p>(ii) any conspicuous change in visual clarity;</p> <p>(iii) the rendering of freshwater unsuitable for consumption by farm animals;</p> <p>(iv) any significant adverse effects on aquatic life, other than the target species <u>and other exotic weeds</u>;</p> <p>(e) there is no adverse effect on any water takes permitted by the RMA, this Plan or under a resource consent;</p> <p>(f) there are no recorded historic heritage sites in the surface waterbody or artificial watercourse, at the point of discharge or within 1 km downstream of the discharge point;</p> <p>(g) the discharge does not take place into water within natural state waters, or into waters subject to a water conservation order <u>except where a biosecurity incursion response is required under the Biosecurity Act</u> .</p>
214.4	Donald Farm	Rule 9	Support	Retain.
247.6	Environment Southland	Rule 9	Amend	<p>Amend Rule 9 as follows:</p> <p>The discharge of agrichemicals and any associated wetting, ...</p> <p><del>(g) the discharge does not take place into water within natural state waters, or into waters subject to a water conservation order.</del></p> <p><u>(h) the discharge does not take place into waters subject to the Maitara River Water Conservation Order or identified in item 1 of schedule 1 of the Oreti River Water Conservation Order, unless the discharge is undertaken pursuant to the Soil Conservation and Rivers Control Act 1941.</u></p>
258.7	Eyre Creek Ltd	Rule 9	Support	Retain.
265.78	Federated Farmers of NZ (Southland Province)	Rule 9	Support in part	Delete Rule 9(f)
341.4	Gunton Farms Ltd	Rule 9	Support	Retain.
372.8	Heritage NZ	Rule 9(f)	Support in part Amend	Retain.
390.24	Horticulture NZ	Rule 9	Oppose in	Add to Rule 9:



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			part	<p><u>h) The activity shall comply with best practice for aquatic use as set out in NZS8409:2004 Management of Agrichemicals.</u></p> <p><u>i) Qualifications</u>  <u>Discharge of agrichemicals directly into or onto water can be carried out only by persons Holding either:</u></p> <p><u>a) a GROWSAFE® Registered Chemical Applicators Certificate (National Certificate in Agrichemical Aquatic strand)</u></p> <p><u>or:</u>  <u>GROWSAFE® Introductory Certificate and under direct supervision of a person holding a GROWSAFE® Registered Chemical Applicator Certificate (National Certificate in Agrichemical Aquatic strand)</u></p> <p><u>b) Aerial application –the pilot must hold a GROWSAFE® Pilots Agrichemical Rating Certificate issued by CAA and the application company must hold AIRCARE™ Accreditation</u>  <u>Where spraying is occurring in a public place signs shall be placed within the immediate vicinity of the spraying prior to commencing and maintained until spraying has ceased.</u></p> <p><u>j) Records</u>  <u>All users must keep records consistent with Appendix C9 of NZS8409:2004 Management of Agrichemicals as evidence and information that provides an authentic record to verify that the application of agrichemical(s) directly to water has been carried out in a safe responsible manner, in particular with respect to notification of any person who may take water for their own use. Such records must be provided to Environment Southland when requested.</u></p> <p><u>Add a Note: Provisions in the Regional Air Plan will also apply to the discharge of agrichemicals.</u></p>
391.1	HOWE M A & B J	Rule 9	Oppose	Ensure rules apply to urban discharges.
523.6	MCGREGOR Grant	Rule 9	Amend	The discharge shall not be to natural state waters <del>or to waters subject to a water conservation order.</del>
556.2	MCRAE Joe	Rule 9	Support	Retain.
557.1	MCRAE Matt	Rule 9	Support	Retain.
558.6	MCRAE Natalie	Rule 9	Support	Retain.
570.11	MILLER R L & S J Farm	Rule 9	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Trust			
614.16	NZ Transport Agency	Rule 9	Oppose Amend	(c) the discharge shall not be to natural state waters <del>or to waters subject to a water conservation order.</del>
664.19	Real Journeys Ltd	Rule 9		Provide for the use of herbicides in and around waterways unrelated to agriculture.
697.1	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 9	Support	Retain.
698.2	Rural Contractors of NZ (Graeme Mathieson)	Rule 9	Support in part	Amend Rule 9 as follows: The discharge of agrichemicals and any associated wetting, antifoaming and anti-drifting agents and marker dyes, <u>onto or</u> into surface water, is a permitted activity provided the following conditions are met...
742.9	South Island Eel Industry Association	Rule 9		We recommend that Rule 9 subsection (g) be deleted.
749.72	Southland Conservation Board	Rule 9	Amend	Include <u>Use of chemicals for the control of pest plants along waterways to assist in the development of riparian areas along the margins of waterways</u> as a discretionary activity, in a separate Rule if necessary.
752.101	Southland Fish & Game Council	Rule 9	Support	Retain.
753.6	Southland River Liaison Committees	Rule 9	Amend	(c) the discharge shall not be to natural state waters <del>or to waters subject to a water conservation order.</del>
769.1	STEVENSON G V & B P	Rule 9	Oppose	Ban the practice.
792.18	TAYLER Matthew	Rule 9	Support	Retain.
797.33	Nga Runanga and TRONT	Rule 9	Support in part	Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaītai reserve or taiāpure.</u>
817.9	Tomogalak Gorge Trust (Jeffery Keen)	Rule 9	Support	Retain
818.10	Tomogalak Gorge Trust (John Keen)	Rule 9	Support	Retain.
819.10	Tomogalak Gorge Trust	Rule 9	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Linzi Keen)			
832.71	VAN GOOL Raewyn	Rule 9	Support	Retain.
868.11	Wilkins Farming Ltd	Rule 9	Support	Retain.
877.40	WILSON Aaron	Rule 9	Support	Retain.
880.44	WILSON Shannon	Rule 9	Support	Retain.

### Rule 10 – Discharge of agrichemicals to land where they may enter water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.30	Alliance Group Ltd	Rule 10	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.76	Aratiatia Livestock Ltd	Rule 10	Support	Retain.
25.23	Ardel Dairies Ltd	Rule 10	Amend	Remove clause (c).
31.2	AYERS Warren	Rule 10	Support	Retain.
40.3	BAKER David	Rule 10	Support	Retain.
108.70	BYTHELL Jesse	Rule 10	Support	Retain.
152.2	Clover Bell Ltd	Rule 10	Support	Retain.
205.22	Dillon Ag Ltd (Chris Dillon)	Rule 10	Amend	Remove clause (c).
206.22	Dillon Ag Ltd (Rochelle Dillon)	Rule 10	Amend	Remove clause (c).
210.80	Director-General of Conservation	Rule 10	Support in part	Amend Rule 10 to read: <u>Rule 10 – Discharge of agrichemicals to land where they may enter water</u> The discharge of agrichemicals and any associated wetting, antifoaming and anti-drifting agents and marker dyes onto or into land where they may enter water is a permitted activity provided the following conditions are met: (a) the agrichemical is approved for use within New Zealand under the Hazardous Substances

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				and New Organisms Act 1996, and the use and discharge of the substance is in accordance with all the conditions of the approval; (b) all practicable measures are taken to minimise spray drift beyond the target area2; (c) the discharge shall not be to natural state waters or to waters subject to a water conservation order <u>except where a biosecurity incursion response is required under the Biosecurity Act .</u>
214.5	Donald Farm	Rule 10	Support	Retain.
247.7	Environment Southland	Rule 10	Amend	Amend Rule 10 as follows: The discharge of agrichemicals and any associated wetting, ... (c) <del>the discharge shall not be to natural state waters or to waters subject to a water conservation order.</del> <u>there is no reduction in the quality of water beyond the zone of reasonable mixing for natural state waters and waters subject to the Maitai River Water Conservation Order or identified in item 1 of schedule 1 of the Oreti River Water Conservation Order.</u>
258.8	Eyre Creek Ltd	Rule 10	Support	Retain.
337.12	Growplan Ltd	Rule 10		Chemicals not from agrichemical sources should be included: Phthalates (plastic softeners as used in agricultural wrapping – proven hormone mimics) appear to be missing from control list. Treated timber leaching from fenceposts – this is a recognised issue in several parts of NZ e.g. Marlborough wine country where leachates restrict soil microbial processes. Glyphosate breakdown products need to be controlled at as they damage many mycorrhizal associations.
341.5	Gunton Farms Ltd (Jeremy Gunton)	Rule 10	Support	Retain.
387.8	HORRELL Andrew	Rule 10	Support	Retain.
390.25	Horticulture NZ	Rule 10	Support in part	Amend Rule 10 by adding a <u>Note: Provisions in the Regional Air Plan will also apply to the discharge of agrichemicals.</u>
523.7	MCGREGOR Grant	Rule 10	Amend	The discharge shall not be to natural state waters <del>or to waters subject to a water conservation order.</del>
558.7	MCRAE Natalie	Rule 10	Support	Retain.
614.17	NZ Transport Agency	Rule 10	Oppose Amend	(c) the discharge shall not be to natural state waters <del>or to waters subject to a water conservation order</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.20	Real Journeys Ltd	Rule 10		Provide for the use of herbicides in and around waterways unrelated to agriculture.
697.2	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 10	Support	Retain.
698.3	Rural Contractors of NZ (Graeme Mathieson)	Rule 10	Support	Amend Rule 10 as follows: Rule 10 – Discharge of agrichemicals <u>onto or into</u> land <u>including</u> where they may enter water The discharge of agrichemicals and any associated wetting, antifoaming and antidrift agents and marker dyes onto or into land <u>including</u> where they may enter water is a permitted activity provided the following conditions are met...
742.10	South Island Eel Industry Association	Rule 10		Sub section (c) of Rule 10 should be deleted.
752.102	Southland Fish & Game Council	Rule 10	Support	Retain.
792.19	TAYLER Matthew	Rule 10	Support	Retain.
797.34	Nga Runanga and TRONT	Rule 10	Support in part	Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaihai reserve or taiāpure.</u>
802.21	The 254 Partnership & Gerken Family Trust	Rule 10	Amend	Remove clause c.
817.10	Tomogalak Gorge Trust (Jeffery Keen)	Rule 10	Support	Retain
818.11	Tomogalak Gorge Trust (John Keen)	Rule 10	Support	Retain.
832.72	VAN GOOL Raewyn	Rule 10	Support	Retain.
868.12	Wilkins Farming Ltd	Rule 10	Support	Retain.
880.45	WILSON Shannon	Rule 10	Support	Retain.
877.41	WILSON Aaron	Rule 10	Support	Retain

### Rule 11 – Discharge of vertebrate pest control poisons

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.31	Alliance Group Ltd	Rule 11	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.77	Aratiatia Livestock Ltd	Rule 11	Support	Retain.
40.4	BAKER David	Rule 11	Support	Retain.
108.71	BYTHELL Jesse	Rule 11	Support	Retain.
118.1	Carmyllie Farm	Rule 11	Oppose	I think it should be used when needed but only after all other resources like trapping and bit feeding has been used, and keep air drops 100 m away from all waterways.
152.3	Clover Bell Ltd	Rule 11	Support	Retain.
210.81	Director-General of Conservation	Rule 11	Support in part	Amend Rule 11 - Discharge of vertebrate pest control poisons to read: The discharge of vertebrate pest control poisons, including sodium monofluoroacetate (1080), baits, pre-feed and deer repellent, into or onto land where it may enter water <u>or to water</u> is a permitted activity provided the following conditions are met: (a) the agrichemical is approved for use within New Zealand under the Hazardous Substances and New Organisms Act 1996, and the use and discharge of the substance is in accordance with all the conditions of the approval; (b) the discharge does not occur within the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J.
214.6	Donald Farm	Rule 11	Support	Retain.
279.62	Forest & Bird NZ	Rule 11	Support with amendment	Amend Rule 11 as follows: The discharge of vertebrate pest control poisons, including sodium monofluoroacetate (1080), baits, pre-feed and deer repellent, into or onto land where it may enter water <u>or to water</u> is a permitted activity provided the following conditions are met:
341.6	Gunton Farms Ltd	Rule 11	Support	Retain.
390.26	Horticulture NZ	Rule 11	Support in part	Amend Rule 11(a) by replacing agrichemical with 'vertebrate pest control product'.
475.1	LITTLE Trevor	Rule 11	Oppose	The complete banning of 1080 pesticide in Southland for a trial period of ten years so as to trial and evaluate new and proposed methods of pest eradication.
513.1	MCCLELLAND Peter	Rule 11	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
528.2	MCKAY A S & D E	Rule 11		Stop the use of 1080 poison.
581.1	MORRIS Lenore	Rule 11	Oppose	1080 or any other poisons should be used in a controlled manner only i.e. bait stations.
582.1	MORRIS Peter & Norina	Rule 11	Oppose	1080 and any poisons should be used in a controlled manner only i.e. bait stations.
620.1	OSPRI New Zealand Ltd	Rule 11	Amend	<p>That Rule 11 be amended as follows:</p> <p>Rule 11 - Discharge of vertebrate pest control poisons</p> <p>The <u>aerial and ground based</u> discharge of vertebrate pest control poisons, including sodium monofluoroacetate (1080), baits, pre-feed and deer repellent into or onto land where it may enter water, <u>and in the case of where it is aerially applied where it will go directly to water</u>, is a permitted activity provided the following conditions are met:</p> <p>(a) the agrichemical is approved for use within New Zealand under the Hazardous Substances and New Organisms Act 1996, and the use and discharge of the substance is in accordance with all the conditions of the approval;</p> <p>(b) the discharge does not occur within the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J.</p>
657.1	Rakiura Tūi Islands Administering Body (RTIAB)	Rule 11	Support	Retain.
705.1	SALLIS Robin	Rule 11	Support	I support the use of 1080 where it is the most practical and cost-effective control measure, with the safeguards included in rule 11.
742.11	South Island Eel Industry Association	Rule 11	Oppose	We oppose this being a permitted activity and request that it be discretionary in all cases.
752.103	Southland Fish & Game Council	Rule 11	Support	Retain.
754.1	Southland TBfree Committee	Rule 11	Amend	<p>Rule 11 be amended as follows:</p> <p><b>Rule 11 - Discharge of vertebrate pest control poisons</b></p> <p>The discharge of vertebrate pest control poisons, including sodium monofluoroacetate (1080), baits, pre-feed and deer repellent into or onto land where it may enter water <u>or where it may go directly to water</u> is a permitted activity provided the following conditions are met:</p> <p>(a) the agrichemical is approved for use within New Zealand under the Hazardous Substances</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				and New Organisms Act 1996, and the use and discharge of the substance is in accordance with all the conditions of the approval; (b) the discharge does not occur within the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J.
790.3	TAIT G R & J E & Waikawa Valley Trust	Rule 11	Oppose	Oppose 1080 discharge in or onto land that may enter water.
797.35	Nga Runanga and TRONT	Rule 11	Support in part	Retain but amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaītai reserve or taiāpure.</u>
817.11	Tomogalak Gorge Trust (Jeffery Keen)	Rule 11	Support	Retain
818.12	Tomogalak Gorge Trust (John Keen)	Rule 11	Support	Retain.
819.11	Tomogalak Gorge Trust (Linzi Keen)	Rule 11	Support	Retain.
832.73	VAN GOOL Raewyn	Rule 11	Support	Retain.
864.3	Whyte Partnership	Rule 11	Oppose Amend	Oppose use of 1080.
877.42	WILSON Aaron	Rule 11	Support	Retain.
880.46	WILSON Shannon	Rule 11	Support	Retain.

## Rule 12 – Discharge of non-toxic dyes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.32	Alliance Group Ltd	Rule 12	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.78	Aratiatia Livestock Ltd	Rule 12	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.72	BYTHELL Jesse	Rule 12	Support	Retain.
411.26	Invercargill City Council	Rule 12	Oppose	The rule is amended so that it is a permitted activity subject to meeting the required standards.
752.104	Southland Fish & Game Council	Rule 12	Support	Retain.
817.12	Tomogalak Gorge Trust (Jeffery Keen)	Rule 12	Support	Retain
818.13	Tomogalak Gorge Trust (John Keen)	Rule 12	Support	Retain.
819.12	Tomogalak Gorge Trust (Linzi Keen)	Rule 12	Support	Retain.
832.74	VAN GOOL Raewyn	Rule 12	Support	Retain.
877.43	WILSON Aaron	Rule 12	Support	Retain.
880.47	WILSON Shannon	Rule 12	Support	Retain.

### Rule 13 – Discharge from installed subsurface drainage systems

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
3.4	A P & S M Verhaegh Ltd	Rule 13	Amend	Tile cleaning is necessary to maintain good drainage and if carried out effectively, there is minimal sediment/discolouration to water.
7.3	AdBest Partnership	Rule 13	Oppose	Remove clause (iv). Give sufficient time for (v).
13.2	All In Ltd	Rule 13	Support in part Amend	We recommend an allowance needs to be made for drain/tile cleaning using water blasting.
17.33	Alliance Group Ltd	Rule 13	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
20.1	ANDERSON Robert	Rule 13	Oppose	Ongoing maintenance for tile pipes or plastic pipe to clear blockages though water blasting cannot control discharge clarity of receiving water body

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.79	Aratiatia Livestock Ltd	Rule 13	Support	Retain.
25.24	Ardel Dairies Ltd	Rule 13	Support	Retain.
26.8	Ardoyne Farm Dairys	Rule 13	Support in part Amend	Amend to make allowance for tile/drain cleaning e.g. water blasting.
28.1	Aurum Farming Ltd	Rule 13 (a)(iii)	Amend	Amend to allow for natural drainage from one property to another.
31.3	AYERS Warren	Rule 13	Support	Retain.
33.2	BACON V M	Rule 13	Oppose	Map all new tile drains.
35.1	BAIRD Aaron	Rule 13	Support	Retain.
37.1	BAIRD J J	Rule 13	Amend	New drains or the upgrading of existing drains need to be mapped and provided to ES on request.
38.1	BAIRD M G & R J	Rule 13(a)(v)	Amend	New drains or the upgrading of existing drains need to be mapped and provided to ES on request.
40.5	BAKER David	Rule 13	Amend	Take having to map tile drains out of the plan.
45.1	BALDWIN Geoffrey	Rule 13(a)(i)	Oppose	Allow drain cleaning and the implanting of new tile drainage systems without the fear of prosecution because of dirty water flowing into watercourses.
54.7	Bayswater Dairy Ltd	Rule 13	Support Amend	Add an exception for periodic tile/drain cleaning.
62.7	Beef + Lamb NZ	Rule 13	Support	Retain.
63.2	BEGGS N W & C E	Rule 13	Neutral	Remove the mapping of full existing drains which are being maintained or upgraded. Partial mapping where the maintenance occurs may be practical, and is similar to the mapping of new drains.
65.1	Bellevue Dairies Ltd	Rule 13(a)(i)	Amend	Include provisions for both water blasting and maintenance work for subsurface drainage systems. Delete the 20m water clarity rule.
73.11	BLACK Family Trust	Rule 13	Support	Retain.
74.1	BLACK G L & R R	Rule 13	Support Amend	We support this rule in principle however, there needs to be an allowance for drain and tile cleaning including water blasting.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
77.1	BLACKMORE Richard	Rule 13	Oppose	Leave as is.
78.1	BLACKMORE Warren	Rule 13	Oppose	Delete.
85.1	BOWMAR Lindsay & Joanne	Rule 13	Oppose	Delete.
89.27	BRENTLEIGH Family Trust	Rule 13	Support	Amend 13 (a)(v) to say "for any new drains, <del>or the maintenance or upgrading of existing drains,</del> the location of the sub-surface drains and outlet relative depth and position is mapped and <del>provided to Environment Southland upon request</del> held by the land owner".
107.2	BYARS Richard	Rule 13	Oppose	Cannot see any benefit in mapping tile drains.
108.73	BYTHELL Jesse	Rule 13	Support	Retain.
118.2	Carmyllie Farm	Rule 13	Oppose	I support as long as rule 13 allows drainage to be done on farm to take water away from wet areas to achieve farmable land. Work shouldn't be checked while being done and should be checked after the work is finished as there will be dirty water flowing due to digging up soils etc.
123.1	Caughey Ltd	Rule 13	Oppose	No specific decision requested.
133.2	Civil Tech Ltd	Rule 13(a)	Amend	...location of the sub-surface drains outlet (relative depth and) position is mapped... ...existing drains, the outlet position is mapped...
137.1	CLARKE B D & H J Partnership (Brendon Clarke)	Rule 13	Support	Retain.
138.1	CLARKE B D & H J Partnership (Hayley Clarke)	Rule 13	Support	Retain.
140.1	CLARKE Julie	Rule 13	Support	Retain.
141.1	CLARKE Julie Ann & TUCK Roger	Rule 13	Support	Retain.
152.4	Clover Bell Ltd	Rule 13	Support	Retain.
154.2	Coastal Plains Ltd	Rule 13	Support Amend	We recommend an allowance needs to be made for drain/tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
155.3	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 13	Support	Retain

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
156.5	COCKBURN Grant & Rachel	Rule 13	Support	Retain.
159.2	COLLING Leigh	Rule 13	Oppose	Remove 20m as this is not practical in any area and remove requirement to map existing drains.
160.3	COLLING Megan	Rule 13	Oppose	Delete
168.1	COPLAND R D & N J Family Trust	Rule 13(a)(ii)	Amend	I think 100 metres would be more appropriate than 20 metres.
170.1	CORCORAN Martin Peter	Rule 13	Oppose	Oppose – no specific decision requested.
175.1	CRACK Stephen	Rule 13(b)	Oppose	Delete as these activities should be covered as per Federated Farmers recommendations.
176.2	Crayburn Farm Trust	Rule 13	Oppose	Delete.
181.12	CRUICKSHANK Peter & Liz	Rule 13		Amend Rule 13 to be a permitted activity in the case of exceptionally heavy rainfall such as are happening worldwide with climate change.
188.1	Dairy Farms NZ Ltd	Rule 13(a) (iii)	Oppose	Delete.
189.30	Dairy Holdings Ltd	Rule 13		Retain Rule 13, with amendment to 13(a)(i): there is no conspicuous change to the colour and/or clarity of the receiving waters at a distance of 20 metres from the point of discharge, <u>except where this arises from natural causes such as heavy rainfall or flooding</u> ;
192.6	DALE P T & S B Trust	Rule 13	Support in part	Be lenient on farmers if no wetland area is available for managing a drain i.e. be able to tap into existing road culverts or install own culvert escape routes through the required drainage plan for new drains as required. Managing the drain via a wetland is a good idea but only if it was there in the first instance and farmers are NOT required to create a wetland area.
197.6	DEVINE Wade	Rule 13	Neutral	The Southland Drainage act / bylaw has provision for dealing with drainage rights and obligations in that it asserts the right to allow drainage through properties when the natural lay of the land requires downstream outlet for natural water flows. The right to allow proper land drainage should remain.
205.23	Dillon Ag Ltd (Chris Dillon)	Rule 13	Support	Amend 13a-5 to say “for any new drains, the location of the sub-surface drains and outlet relative depth and position is mapped and held by the land owner”.
206.23	Dillon Ag Ltd (Rochelle Dillon)	Rule 13	Support	Amend 13a-5 to say “for any new drains, the location of the sub-surface drains and outlet relative depth and position is mapped and held by the land owner”.
209.26	DIPROSE Dave	Rule 13	Oppose	For any new drains <del>or the maintenance or upgrading of existing drains</del> , the location of the sub-

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				surface drains and outlet relative depth and position is mapped and provided to Environment Southland upon request; and maintenance needs to be defined, does this mean cleaning of tiles and drains?
214.7	Donald Farm	Rule 13(a)	Support in part	Retain all of clause (a) except 13(a) v: Because there is no benefit relative to the cost of compliance. Recommend that Rule 13(b) is a controlled activity.
215.2	Dooley Partnership	Rule 13	Support	Retain.
224.3	DUFFY Paul	Rule 13(v)	Support	I support the requirement to map new and existing drains as valuable information for both ES and farmers. I suggest ES make a standard map available to farmers to enter information onto so a consistent quality would be available including date of installation, size and type of drainage.
233.4	DYSON Valerie &Glyn	Rule 13(a)(v)	Amend	Delete part (a) (v).
235.1	EADE G T & F A	Rule 13(a)(i)	Amend	Retain and amend (a)(i). A conspicuous change to colour of water greater than 20 metres from point of discharge is a permitted activity as long as only caused by water blasting and maintaining subsurface drainage systems and installing – (natural containment).
242.1	ELDER Hamish	Rule 13	Oppose	I agree with the mapping of all new tile drains and when maintenance is undertaken on old tiles but it will be impossible for us to locate all old tiles as they were put there by previous owners with no record of their location.
247.8	Environment Southland	Rule 13	Amend	Add new Rule 13(a)(vii) as follows: <u>The discharge does not contain drainage water from a wetland.</u>
249.20	Ernslaw One Ltd	Rule 13	Support Amend	Amend the conditions of Rule 13 to – Remove any reliance on reasonable mixing - require that a bio-filter or constructed wetland, or other effective measure as approved by Council, be established and maintained to mitigate the effects of contaminants discharging from the subsurface drainage.
253.1	EVANS Frederick & BROCKMAN Carla	Rule 13	Support	Retain.
254.2	EVANS Harold	Rule 13	Oppose	Propose all future drains could be mapped providing this can be done with minimal cost and not existing drains.
255.1	EVANS Mark	Rule 13	Oppose	Please consider going down the road of developing a management plan as opposed to a consenting process.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
257.1	EVANS O R & T D	Rule 13	Oppose	Make permitted.
259.5	F D Enterprises Ltd	Rule 13	Amend	There is no conspicuous change to the colour and/or clarity of receiving waters at a distance of 20 metres from the point of discharge <u>with the exception of water blasting tile drains and cleaning open drains.</u>
261.2	Fairmount Perendale Stud Farm	Rule 13	Oppose Amend	(a)(i) this clause should be changed to make provisions for any conspicuous change in visual clarity after a determined period that is deemed to be a permanent change in visual clarity and not just a settling period of the initial drainage disturbance. Example: farm drainage in itself is a disturbance initially, until the new drain has a chance to settle after it is filled in. therefore the preferred outcome is a settling period for new drains.
265.79	Federated Farmers of NZ (Southland Province)	Rule 13	Support in part	Amend Rule 13 as follows: (a) The discharge of land drainage water to water from an on-farm subsurface drainage system, is a permitted activity, provided: (i) there is no conspicuous change to the colour and/or clarity of the receiving waters at a distance of 20 metres from the point of discharge; (ii) the discharge does not render freshwater unsuitable for consumption by farm animals; (iii) the discharge does not cause or exacerbate the flooding of any other landholding; (iv) the discharge does not cause any scouring or erosion of any land or bed of a waterbody beyond the point of discharge; <del>(v) for any new drains or the maintenance or upgrading of existing drains, the location of the sub-surface drains and outlet relative depth and position is mapped and provided to Environment Southland upon request; and</del> (vi) the discharge does not cause any significant adverse effects on aquatic life.
266.3	Fenham Downs Ltd	Rule 13	Oppose	Remove requirement for consent.
270.1	Firdale Farms Ltd	Rule 13	Support	Retain.
277.41	Fonterra Co-operative Group Ltd	Rule 13	Oppose in part	Delete the word “installed” from the heading.
279.63	Forest & Bird NZ	Rule 13	Support with amendment	Either make these activities discretionary or amend Rule 13 to replace (a)(i) and (vi) with clear and measurable standards. Add“(vii) The discharge does not reduce the water quality standard below any standards set for <u>the relevant waterbody in Appendix E “Water Quality Standards” at a distance of 20 metres from the point of discharge.</u> ”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
294.2	Gardyne Agriculture Ltd (Duncan Gardyne)	Rule 13	Oppose	Oppose mapping of tile drains. Don't know where all the drains are. Question the benefits of mapping tile drains.
295.2	Gardyne Agriculture Ltd (Fred Gardyne)	Rule 13	Oppose	Delete requirement to map drains.
298.1	GARDYNE Joanne	Rule 13(a)(v)	Oppose	Remove Rule 13(a)(iv).
299.13	GARDYNE John	Rule 13	Oppose	Delete "v".
300.12	GARDYNE Jonathan	Rule 13	Oppose	Take out the Rule 13 as it comes under Rule 5, 6 and 7. This rule is unfair as it does not affect roads and council drainage networks which are just as bad.
311.1	GILL Murray John	Rule 13(v)	Amend	Environment Southland's responsibility to provide a simple digital mapping programme to make it simple for landowners to provide Environment Southland a map of existing and new drains to be funded by the general rates.
314.1	Gladvale Farms Ltd	Rule 13(i)	Oppose	Delete.
336.1	GRIMM Hamish	Rule 13		Mapping of new subsurface drains only. Drainage from installed subsurface systems should not need to be consented unless there is clear evidence of a problem.
339.7	GUNN Olivia	Rule 13	Support	We recommend that Section (a) (i) be altered to add an exception for periodic tile/drain cleaning.
344.3	Hall Ag Ltd (Glenda Hall)	Rule 13	Oppose	Remove mapping requirement.
345.4	Hall Ag Ltd (John Hall)	Rule 13	Oppose	Remove mapping requirement.
355.9	HARRIS David	Rule 13	Amend	Add clause regarding the discharge not having an adverse effect on water quality it is discharged into.
361.7	HBG AgriLimited	Rule 13	Support Amend	Amend Rule 13 to allow for tile/drain cleaning using water blasting. This practice needs to be done periodically; otherwise the tiles/drains will block and become ineffective. This will have serious environmental effects as the land will flood causing significant sediment and phosphate overland flow. Also if the tiles/drains are not kept flowing, the substantial investment of the tile/drain infrastructure is rendered useless.
362.1	Hedgehope Grazing Ltd	Rule 13	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
386.7	Hopcroft Farms Ltd	Rule 13	Support in part Amend	I recommend an allowance needs to be made for drain/tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
387.9	HORRELL Andrew	Rule 13	Support	Clarify mapping requirements and level of accuracy required.
390.27	Horticulture NZ	Rule 13	Oppose	Amend Rule 13 as follows: (a)(i) <u>After reasonable mixing</u> : - There is no conspicuous change to the colour and or clarity of the receiving waters and - The discharge does not render freshwater unsuitable for consumption by farm animals Renumber clauses iii- v) AND Delete clause vi). Amend Rule 13(b) to Restricted Discretionary activity and include matters of discretion: <u>The standards in Rule 13 that cannot be met</u>
391.2	HOWE M A & B J	Rule 13	Oppose	Tile drains can have cleaner discharge than surface runoff.
394.1	HUDSON O F & S M	Rule 13	Oppose	Delete.
397.2	Hughes-Crowley Company Ltd	Rule 13	Support in part Amend	We recommend an allowance needs to be made for drain/tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
402.7	HUNT Alistair & Bernadette	Rule 13	Amend	Delete.
411.27	Invercargill City Council	Rule 13	Oppose in part	Delete point (iii) from Rule 13.
416.1	IRWIN Robyn	Rule 13	Amend	Change all references to subsurface drains to require only new drains to be mapped or to have the phrase “where known” added to the requirement for drains to be mapped for consents, permitted activities and management plans.
420.1	JACK Wallace	Rule 13	Oppose	Discharge no flooding any other landholding or scouring or erosion or change to the colour. Mainly controlled by nature.
421.2	JAMES S T & K A Family Trust	Rule 13	Oppose	Oppose mapping of drainage underground.
431.2	Kaikaha Farms Ltd	Rule 13	Support in part Amend	We recommend an allowance needs to be made for drain/tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
443.1	KING Farming Partnership	Rule 13		Make tile drains a permitted activity. Make drain cleaning permitted.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
451.6	Knockinnon Farm Trust	Rule 13	Amend	Ensure allowance is made to clean drains using water blasting or similar cleaning method.
469.1	LEGG Rob & Nessa	Rule 13	Oppose	By definition this is impossible to classify/understand/stop and does not reflect the complex nature of flowing water and how it interacts with land. It is unachievable to include this as a Condition in a Rule as it meaningless, water erodes wherever it flows. How can it be measured in a practical sense?
471.1	LINDSAY Chris	Rule 13	Oppose	No specific decision requested.
472.1	LINDSAY Jill	Rule 13	Oppose	No specific decision requested.
473.2	LINDSAY Ray	Rule 13	Oppose	No specific decision requested.
478.17	LOVERIDGE David	Rule 13	Support Amend	There must be an allowance for tile blasting/cleaning of field tiles.
482.10	Lower Aparima Catchment Group	Rule 13	Support in part Amend	We recommend an allowance needs to be made for drain/ tile cleaning using water blasting.
488.1	MACDONALD Brian	Rule 13	Support	Retain.
494.1	MACKINTOSH Alistair	Rule 13	Amend	Amend Rule 13 to only require mapping of new tile drains.
515.4	MCCROSTIE Ray	Rule 13(v)	Oppose	Amend the rule to state that while it would be considered good farming practice to map any new sub-surface drains this is voluntary.
518.7	MCDONALD Stuart & HALDER Robyn	Rule 13		This section might be more correctly titled Artificial Drainage or Installed Drainage or some similar term. Mapping requirements will prove quite onerous. Where farm ownership has changed, records may be non-existent.
536.10	McKelvie Ltd	Rule 13	Support	Retain.
537.2	MCKENZIE G & T Partnership	Rule 13		We support mapping new tiles and drainage systems but also feel that for intensive grazing paddocks it is near on impossible to map all the pre-existing tiles as records have not been kept from previous generations. Also, we think that it is important that ES encourages filtering or sediment traps where practical, but not as a compulsory requirement. We also feel that ES needs to be realistic with regards to their proposed discharge requirements, especially during adverse weather conditions.
538.2	MCKENZIE Hayden	Rule 13	Oppose Amend	Roughly map any new drains going into the property as it is hard to pinpoint exact locations without the use of a GPS. Or council should provide GPS if requiring exact location of new drains.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
553.6	McPhelzo Trust (C G & M P Pullar)	Rule 13	Support	Retain.
554.7	McPhelzo Trust (Z, E & P Pullar)	Rule 13	Support	Retain.
555.11	MCRAE Daryl & Ruth	Rule 13	Support	Retain.
556.3	MCRAE Joe	Rule 13	Oppose	Amend so the mapping requirement is to the best of the farmer's knowledge.
557.2	MCRAE Matt	Rule 13	Oppose	Amend to require mapping to the best of the farmer's knowledge.
560.2	MCRAE Tim & Justine	Rule 13	Support	Retain.
564.8	Mid-Aparima Catchment Group	Rule 13	Support Amend	We recommend that Section (a) (i) be altered to add an exception for periodic tile/drain cleaning.
570.12	MILLER R L & S J Farm Trust	Rule 13	Support in part	Delete point (v) regarding mapping.
573.1	MINTY J R	Rule 13	Oppose	Tile drains must remain open, to access cleaning and maintenance.
590.6	Mt Linton Station	Rule 13(a)	Amend	Change to "the discharge of land drainage water to water from an on-farm subsurface drainage system, is a permitted activity, <u>under normal climatic conditions</u> , provided:
592.2	Mt Peel Ltd	Rule 13	Oppose	Remove requirement in Bedrock Physiographic Zone.
622.18	P F Olsen Ltd	Rule 13	Amend	Amend the condition of Rule 13 to establish a pathway for improving the standard of contaminant discharges from subsurface drainage systems in accordance with policies and objectives. This may include reference to techniques and technologies that are required as part of farm management plans, best management practice or a grandparented phase-in period.
624.2	Paraemara Ltd	Rule 13	Oppose	Oppose – leave as it is.
634.2	PETER Hayden Trust	Rule 13		Need clarification of what can be tiled in the future i.e. the definition of a critical source area versus a waterway. Need the ability to mechanically clean tiles, tile outlets and ditches. Suggest riparian planting species that don't enter tiles, what are they?
640.33	Pourakino Catchment Group	Rule 13	Support in part	(a) The discharge of land drainage water to water from an on-farm subsurface drainage system, is a permitted activity, provided: (i) there is no conspicuous change to the colour and/or clarity of the receiving waters at a

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				distance of 20 metres from the point of discharge <u>excluding temporary effects associated with cleaning and unblocking of drains.;</u>
641.2	POYNTZ-ROBERTS David	Rule 13	Oppose	News drains put in can be mapped – not old drains.
642.2	PREBBLE Lynden	Rule 13	Support	Retain.
643.2	PREBBLE Sandra	Rule 13	Support	Retain.
650.2	PULLAR I J & K M	Rule 13	Oppose	Remove requirement to map tile drains.
652.3	PULLAR Mary	Rule 13	Support	Retain.
654.1	R D & J D Stewart Ltd	Rule 13	Support	Retain.
660.1	RAUBER Kass	Rule 13	Oppose	I do not believe mapping new tile drains will help anybody. It will just add another cost to farms that is not needed.
666.12	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 13	Support	Retain however consideration must be given to how tile cleaning can continue.
672.2	ROBERTSON Antony	Rule 13	Amend	Recognise that mapping can only be approximate.
690.2	ROSS Warren	Rule 13	Oppose	Delete.
691.2	Rossland Farming Ltd	Rule 13	Oppose	Delete.
694.1	ROY Bruce	Rule 13	Support	Retain.
695.1	ROY James	Rule 13	Support	Retain.
697.3	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 13	Support	Retain.
706.10	Sandy Creek Trust	Rule 13	Support	Retain.
712.26	Seaview Trust & Oraka Farms Ltd	Rule 13	Oppose	Remove the mapping of tile drain requirement (v) as this has no direct impact on water quality.
715.2	SHALLARD David & Kim	Rule 13	Oppose	Ensure co-operation with farmers about tile maps and drainage.
719.2	Sharp Trust	Rule 13	Oppose	Delete.
721.1	SHEARING Dean	Rule 13	Amend	Add allowance for drainage maintenance.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
723.1	SHEARING Raymond	Rule 13	Amend	Add allowance for drainage maintenance.
723a.1	SHEARING Euan & Lisa	Rule 13	Amend	Add allowance for drainage maintenance.
724.2	SHIRLEY Wayne & Gaye	Rule 13	Oppose	Map only new drainage.
728.2	Slope Point Farms Ltd	Rule 13	Oppose	Delete requirement to map drains.
730.1	SMALLEY Timothy	Rule 13	Oppose	This would lead to many silted up tile drains and excessive pugging of our land. Well drained land is productive. Impossible to find all the existing drains on farm and extremely impractical to have to get consents for new drains and improving existing ones!
732.3	SMITH George & Kathryn	Rule 13		Should our General relief not be accepted we submit that if water leaving the property is okay; maps, monitoring and Environment Southland involvement in policing this is unnecessary.
733.13	SMITH Hamish & Karen	Rule 13		Amend Rule 13 for tile drains in Intensive Winter Grazing according to our submission point on Rule 23.
735.1	SMITH William	Rule 13		Allow tile drains as a permitted activity and remove requirement to map.
737.15	Smithill Ltd	Rule 13	Amend	All land uses (roading, urban, farming, industrial etc.) should be included under this rule.
738.2	Snowdon Downs	Rule 13	Oppose	Oppose mapping of drainage underground.
741.2	South Hughes Farms Ltd	Rule 13	Support in part Amend	The wintering of a farm business's own stock should be a permitted activity. Avoidance of consenting process.
743.2	Southern Farms NZ Ltd (Brendon Phillips)	Rule 13	Support Oppose	Remove distance from this.
744.1	Southern Farms NZ Ltd (Gene Bryce)	Rule 13	Amend	Mapping required of new and proposed drains as part of management plans.
747.4	Southern Star Farms Ltd	Rule 13	Oppose	Amend the rule to state that while it would be considered good farming practice to map any new sub-surface drains this is voluntary.
748.2	Southern View Ltd	Rule 13	Neutral	Mapping the tile drains as we maintain them or put new ones in, is the only workable solution when you have purchased a property that has tile drains and you have no information.
750.12	Southland District Council	Rule 13		Council seeks a comprehensive analysis be undertaken on the equitability and benefits and costs of the rules and the regulatory framework redrafted to reflect that result.
752.105	Southland Fish & Game	Rule 13	Oppose	Amend Rule 13 to replace (a)(i) and (vi) with clear and measurable standards.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			And Amend Rule 13(a) to include the following additional numbered bullet point: “(vii) <u>The discharge does not reduce the water quality standard below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at a distance of 20 metres from the point of discharge.</u> ”
760.3	St Patricks Farms Ltd	Rule 13	Amend	Allow monitoring of the receiving stream at entrance and exit boundaries to show status at both locations at an agreed timing during heavy rainfall period i.e. Clarity, N, P up and downstream as evidence of any effects.
761.8	STALKER Hanna & Callum	Rule 13	Support	We recommend that Section (a) (i) be altered to add an exception for periodic tile/drain cleaning.
765.2	Stenkoll Farms Ltd	Rule 13	Support Amend	We recommend an allowance needs to be made for drain/tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
771.10	STEWART Family Trust (Trevor Stewart)	Rule 13	Oppose	I propose that you only have to map new tile and mole drains.
774.3	STEWART Vanessa	Rule 13	Amend	I propose that you only have to map new tile and mole drains
777.4	STRATFORD Chris & Lynsey	Rule 13	Support	Retain.
779.2	Strathallan Trust	Rule 13	Amend	Provision yearly. a: Clean outlets of drains (i) High pressure hoses. (ii) Mechanical digger. (iii) Chemical spray b: Repair/replace ineffective drainage areas (i.e. use of filter straw over drains).
783.1	STRINGER Joe	Rule 13	Support	Allow for tile drains to have some algal growth in them. This algal growth is living off the nutrients coming down them and may leave a red or grey colour in the water as it breaks off.
786.3	SUTHERLAND Kevin & Ann	Rule 13	Support	Retain.
798.4	TEMPLETON Luke	Rule 13	Support in part Amend	I recommend an allowance needs to be made for drain/ tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
799.5	TEMPLETON Peter	Rule 13	Support in part Amend	I recommend an allowance needs to be made for drain/ tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
800.1	TEMPLETON Vaughan	Rule 13	Support	Support the principle of this rule. It needs to be noted that periodic drain cleaning needs to be carried out to maintain the efficiency of the drainage network. Any discharge from this process is massively less than overland flow which would result if drains were not cleaned.
802.22	The 254 Partnership & Gerken Family Trust	Rule 13	Support	Amend 13(a)5 to say “for any new drains, the location of the sub-surface drains and outlet relative depth and position is mapped and held by the land owner”.
808.2	THOMAS Alison & Roger	Rule 13	Support	Retain.
811.17	THYS Herman & STAUT Tinneke	Rule 13	Oppose in part	Amend to periodically allow for maintenance work to be carried out.
811.18	THYS Herman & STAUT Tinneke	Rule 13	Oppose in part	Request industry standards and best practise management to be formalised.
817.13	Tomogalak Gorge Trust (Jeffery Keen)	Rule 13	Support	Retain
818.14	Tomogalak Gorge Trust (John Keen)	Rule 13	Support	Retain.
819.13	Tomogalak Gorge Trust (Linzi Keen)	Rule 13	Support	Retain.
821.1	TOSH David	Rule 13	Oppose	No specific decision requested.
832.75	VAN GOOL Raewyn	Rule 13	Support in part	Retain Rule 13(a) (i) – (a)(iv); Delete “or the maintenance or upgrading of existing drains from Rule 13(a)(v); and Delete Rule 13(b)
843.2	Waikaia Plains Ltd	Rule 13	Amend	Allow monitoring of the main drainage outfall at an agreed timing during heavy rainfall period i.e. clarity, N, P as evidence of any effects.
846.1	WALSH Brian	Rule 13	Support	Retain.
851.1	WEIR Darren	Rule 13 a(v)	Oppose	Delete.
852.2	WEIR Pauline & Andrew	Rule 13		Please remove mapping requirement.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
853.1	WEIR Victoria	Rule 13(a) (v)	Oppose	Delete.
861.18	WHITE John Copeland	Rule 13	Support in part Amend	We recommend an allowance needs to be made for drain/ tile cleaning using water blasting. This needs to be completed occasionally to allow for effective drainage of the subsurface drains.
877.44	WILSON Aaron	Rule 13	Support in part	Subsurface drainage must remain a permitted activity. Delete (i) – (vi) and (b). Discharge from installed subsurface drainage systems should not require any form of consent.
878.2	WILSON Douglas	Rule 13	Support	Retain.
879.1	WILSON Kerry	Rule 13	Oppose	No specific decision requested.
880.48	WILSON Shannon	Rule 13	Support in part	Subsurface drainage must remain a permitted activity. Delete (1)-(v1) and (b). Discharge from subsurface drainage systems should not require any form of consent.
882.1	WING D R & H M	Rule 13	Amend	Remove the requirement to provide the locations of drainage system(s) to E.S. on request, identifying and mapping the drainage outlets should be the only requirement.

#### Rule 14 – Discharge of fertiliser

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
14.2	ALLAN Frazer & Karen	Rule 14	Amend	Aerial applications of fertiliser to hill/high country blocks is a permitted activity as long as all fertiliser applications by air are accompanied by GPS co-ordinates.
17.34	Alliance Group Ltd	Rule 14	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.80	Aratiatia Livestock Ltd	Rule 14	Support	Retain.
48.31	Ballance Agri-Nutrients	Rule 14	Support in part	Amend to read: <b>Rule 14 - Discharge of Fertiliser</b> (a) The discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met: (i) there is no direct discharge of fertiliser into a surface waterbody, water in an artificial watercourse or into groundwater; and (ii) there is no fertiliser discharged when the soil moisture exceeds field capacity; and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(iii) <del>there is no fertiliser discharged directly into or within 10 metres of the boundary of any identified significant indigenous biodiversity site;</del></p> <p>(iv) where any permanently flowing river, lake, lagoon, estuary, artificial watercourse or wetland:</p> <p>(1) has riparian planting from which stock is excluded, fertiliser may be discharged up to the paddock-side edge of the riparian planting, but not onto the riparian planting, except for fertiliser required to establish the planting; or</p> <p><del>(2) does not have riparian planting from which stock is excluded, fertiliser is not discharged directly into or within 10 metres of the bed or within 10 metres of a wetland boundary or any identified significant indigenous biodiversity site.</del></p> <p>(b) The discharge of fertiliser in circumstances where the fertiliser may enter water that does not meet the conditions of Rule 14(a) is a non-complying activity.</p>
79.1	BLAIR Phillipa Mary	Rule 14	Oppose	A 3m buffer would be a far better option than 10m.
83.1	BOKSER Greg	Rule 14	Oppose	Rule is unnecessary as good farm management practices will ensure that no direct discharge of fertiliser into a waterbody occurs.
93.1	Broadacres Ltd	Rule 14	Oppose	Delete.
99.1	BUCKINGHAM Greta	Rule 14	Oppose	A 3m buffer would be a far better option than the 10m buffer so that crops and pasture can be fertilised rather than missing fertiliser on the outside of a 7m paddock.
100.1	BUCKINGHAM Janette	Rule 14	Oppose	Amend to include only a 3 metre buffer.
101.1	BUCKINGHAM Thomas	Rule 14	Oppose	A 3 metre buffer would be a far better option.
108.74	BYTHELL Jesse	Rule 14	Support	Retain.
114.1	CALLAHAN Pamela	Rule 14	Oppose	The 10m buffer means a reduction in production from that area of our farm surely 2m would stop fertiliser entering the waterways.
137.2	CLARKE B D & H J Partnership (Brendon Clarke)	Rule 14	Support	Retain.
138.2	CLARKE B D & H J Partnership (Hayley Clarke)	Rule 14	Support	Retain.
152.5	Clover Bell Ltd	Rule 14	Amend	I suggest the word 'deliberate' is inserted in paragraph (a)(1) between the words 'no' and 'direct'



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				to read 'no deliberate direct discharge'.
173.1	COWIE Martin	Rule 14	Oppose	A 3 metre buffer instead of a 10 metre would be more practical.
200.1	DICKIE Alton Brent	Rule 14	Oppose	Delete.
204.1	DICKSON Grant	Rule 14	Oppose	Remove 10 metre margin and replace with control by use of good farm management practices to ensure that no direct discharge of fertiliser into a waterbody occurs.
209.27	DIPROSE Dave	Rule 14	Support	Retain.
214.8	Donald Farm	Rule 14	Support	Retain.
220.12	Drylands Farming Ltd	Rule 14	Support Amend	Rule should state that 'no N based fertiliser be discharged when soil conditions are not suitable, based on soil moisture and temperature levels'. 'Suitability' should be based on evidence from Ravensdown, Balance Agri nutrients, NZFMRA or a combination of the three.
221.12	DRYSDALE Family Trust	Rule 14	Support Amend	Rule should state that 'no N based fertiliser be discharged when soil conditions are not suitable, based on soil moisture and temperature levels'. 'Suitability' should be based on evidence from Ravensdown, Ballance Agrinutrients, NZFMRA or a combination of the three.
224.4	DUFFY Paul	Rule 14(a)(ii)	Support	Retain.
233.5	DYSON Valerie &Glyn	Rule 14	Support	Retain.
249.21	Ernslaw One Ltd	Rule 14	Support Amend	Develop a rule cascade to ensure that farmers applying phosphate based fertiliser test for cadmium and where levels exceed the national average of 0.65 mg Cd/kg, require the testing laboratory to report those tests to Council. Note: NZ's natural background level is 0.16mg Cd/kg of soil (range 0 – 0.77mg Cd/kg),  Where cadmium levels approach trigger levels defined in Appendix 4 of MAF 2011, the activity status for application of phosphate fertiliser should move from Controlled (@ trigger value 'a' - 0.65 mg Cd/kg) to Non-complying (@ trigger value 'd' of 1.8 mg Cd/kg at standard pH)
258.9	Eyre Creek Ltd	Rule 14	Support	Retain.
265.80	Federated Farmers of NZ (Southland Province)	Rule 14	Support in part	Delete Rule 14 and replace as follows:  <u>(a) The discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met:</u> <u>(i) there is no direct discharge of fertiliser into a surface water body, water in an artificial watercourse or into groundwater;</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>(ii) all practicable measures are taken to minimise fertiliser drift beyond the target area and run-off of nutrients to surface water;</u></p> <p><u>(iii) the fertiliser is applied at a rate and volume that minimises leaching of nutrients to groundwater.</u></p> <p><u>(b) The discharge of fertiliser in circumstances where the fertiliser may enter water that does not meet the conditions of Rule 14(a) is a discretionary activity.</u></p>
277.42	Fonterra Co-operative Group Ltd	Rule 14	Oppose in part	Clarify that the term “riparian planting” includes ungrazed grass.
279.64	Forest & Bird NZ	Rule 14	Support with amendment	<p>Amend Rule 14 as follows:</p> <p>(i) there is no direct discharge of fertiliser into a surface waterbody, water in an artificial watercourse or into groundwater; <u>or coastal lagoon or estuary</u> and</p> <p>(ii) there is no fertiliser discharged when the soil moisture exceeds field capacity; and</p> <p>(iii) where any permanently flowing river, lake, lagoon, estuary, artificial watercourse or wetland:</p> <p>(1) has <u>10m of riparian planting</u> from which stock is excluded, fertiliser may be discharged up to the paddock-side edge of the riparian planting, but not onto the riparian planting, except for fertiliser required to establish the planting; or</p> <p>(2) does not have riparian planting from which stock is excluded, fertiliser is not discharged directly into or within 10 metres of the bed or within 10 metres of <u>all water bodies including coastal lagoons and estuaries</u> a wetland boundary or any identified significant indigenous biodiversity site.</p>
293.3	GAMBLE S W & J M	Rule 14		In my opinion this plan appears to apply mostly common sense but the attention to indigenous people rights is unfortunately not given to indigenous species rights when regular topdressing into waterways of deadly poisons and chemicals is a complying activity rather than a discretionary activity obviously to suit various councils activities.
296.3	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 14(a)(2)	Amend	In Rule 14(a)(2), the ten metres be reduced to three metres.
297.8	GARDYNE Hugh & Kathie	Rule 14		<p>Amend to clarify that timing and quantities of fertiliser applications can have a significant effect on nutrient losses. Include:</p> <ul style="list-style-type: none"> <li>• Out of season applications of nitrogenous fertiliser onto pasture at below recommended temperatures or at sowing rates beyond the plant’s capacity to take up nutrients.</li> <li>• Late season applications of annual fertiliser after peak growing seasons have ended and (rather) encourage applications in warmer months.</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
298.2	GARDYNE Joanne	Rule 14	Oppose	That the setback for rule 14(a)(iii)(2) be no more than three metres.
300.13	GARDYNE Jonathan	Rule 14	Oppose	Change to 3 metres.
301.1	GARDYNE Lois	Rule 14(a)(iii)(2)	Oppose	Ten metre setback is too great so distance of discharging fertiliser should be three metres from bed, wetland boundary etc.
313.2	GILLESPIE Maria	Rule 14	Amend	That rule 14(a)(iii)(1) is amended to 'riparian margin of 1m or greater' rather than 'riparian planting' so that fertiliser can be applied up to the paddock-side edge of the riparian margin.
314.2	Gladvale Farms Ltd	Rule 14(2)	Oppose	Delete.
341.7	Gunton Farms Ltd	Rule 14	Support	Retain.
351.1	HAMILTON Rosemary	Rule 14(ii)		Remove the word discharge and replace it with application, this way farmers have control of the situation.
352.1	HAMMOND Emma & Peter	Rule 14	Support	Retain.
362.2	Hedgehope Grazing Ltd	Rule 14 (a)(iii)(2)	Amend	Change rule to say 'not discharged directly into or within 3m.'
365.2	HEENAN M D and D W	Rule 14	Amend	Amend Rule 14(iii)(2) to permit fertiliser to be applied during planting of crops and/or pasture, and a reduction from 10 metres to 3 metres.
370.1	HENDERSON Stephen	Rule 14	Oppose	Allow spreading up to bank edge.
371.3	HENDERSON Tracy	Rule 14	Oppose Amend	Fertiliser all to land not waterways but remove the ten metre rule.
387.10	HORRELL Andrew	Rule 14	Amend	Review the 10m buffer zone requirement. Provide definition of riparian planting. Recognise that mitigation is only necessary where overland flow enters the waterway. Recognise that there are other mitigation options other than riparian planting and that riparian planting will not be the most appropriate technique in all instances. This subject would be better addressed in the farm management plan with relation to critical source areas and their management. Other possible mitigation options might be <ul style="list-style-type: none"> <li>• Only applies fertiliser next to a waterway if pasture cover is high e.g. 2000kgDM/ha.</li> <li>• Application method/equipment.</li> <li>• Do not apply fertiliser if high rainfall is forecast.</li> <li>• Type of fertiliser used.</li> </ul>
390.28	Horticulture NZ	Rule 14	Oppose	Amend Rule 14 (a)(iii)(2) Does not have riparian planting from which stock is excluded, fertiliser is not discharged directly

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>into or</del> <u>best management practices as set out in Code of Practice for Nutrient Management (Fertiliser Association 2013) will be used within 10 metres of a bed where the slope is over 10 degrees</u> or within 10 metres of a wetland boundary or any identified significant indigenous biodiversity site.</p> <p>Amend Rule 14 b) to Restricted Discretionary activity and include matters of discretion:  <u>The standards in Rule 14 that cannot be met.</u></p>
402.8	HUNT Alistair & Bernadette	Rule 14	Amend	<p>Amend the rule to:</p> <ul style="list-style-type: none"> <li>• Ensure no discharge of fertiliser directly to water.</li> </ul> <p>Apply fertiliser in accordance with good management practices, including minimising fertiliser drift, application rate, volume and climatic timing that minimises leaching.</p>
433.3	Kapuka Dairies Ltd	Rule 14	Oppose	Clarification needed regarding discharge of fertiliser into a surface waterbody. If this does include artificial watercourses.
434.1	Kauana Dairy Ltd & Taffy Ltd	Rule 14	Amend	Amend so that fertiliser can be spread to the fence that is protecting the waterway.
461.1	LAMB Bruce & Gaye	Rule 14	Oppose	Amend the 10 metre buffer and replace with a three metre buffer.
486.2	M Gardyne Ltd	Rule 14	Amend	Amend 10m margin to 3 metres.
497.1	Mainland Minerals Southern Ltd	Rule 14	Oppose	<p>We oppose (a) The discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity, provided: - there is no direct discharge into a waterway/waterbody etc. (b) In circumstances where fertiliser may enter water is a non-complying activity. The alternative we propose, is that there are many smarter, more sustainable fertiliser options available to farmers such as:</p> <ul style="list-style-type: none"> <li>• Ensuring regular soil testing throughout all farm areas so only correct nutrient applied</li> <li>• Using Fine Particle Fertiliser for more accurate and even distribution of nutrient, eliminates dust blown to water and ensures customised fertiliser applied lands where intended</li> <li>• Using humate with Urea to increase effectiveness of N application (see Southern Humate/Ag Research trial results) and reduce amount of N input</li> <li>• Using fine lime and microbial inoculants to encourage biological activity and recycle nutrient already in the soil, particularly N, P &amp; S locked up in soil organic matter</li> </ul> <p>Our suggested alternative to deal with these issues is that farmers wishing to fertilise close to water ways should use either fine particle fertiliser or liquid fertiliser and keep GPS ,mapping records showing proof of placement.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Dusty fertilisers like Super Phosphate can only be applied a set distance from waterways unless a minimum ratio of dust/fines can be reliably met to achieve very minimal dust/fines.</p> <p>In support of this, an Environment Southland study conducted on farm at Ray McCrosties, Waituna, measured nitrates in the water after wintering at the end of his tile drains and compared to his neighbour. Ray used Mainland Minerals fertiliser, the neighbour used conventional fertiliser. The nitrates in Rays soil was considerably less than the neighbour.</p> <p>The Department of Biology at University of Otago are shortly due to release results from a three year trial conducted with Mainland Minerals to measure the effects of Fine Particle Fertiliser in South Island soils with a focus on Southland soils.</p> <p>Our 2014 Southland Environment Award and runner up in 2013 Gore District Council Contribution to the Environment Award a recognition that we do have more sustainable, environmentally friendly fertiliser options available.</p>
502.1	MARSHALL Allan & Kathryn	Rule 14	Oppose	A 3m buffer would be a far better option so that crops and pasture can be fertilised rather than missing fertiliser on the outside 7m of a paddock.
506.1	MARSHALL R C	Rule 14	Oppose	Delete.
507.1	MARSHALL Spencer	Rule 14	Oppose	A 3m buffer would be a far better option so that crops and pasture can be fertilised rather than missing fertiliser on the outside 7m of a paddock.
509.1	Matai Farms Ltd	Rule 14	Support	Retain.
518.8	MCDONALD Stuart & HALDER Robyn	Rule 14(a)(iii)(2)		10 Metres from the bed of any watercourse is overly harsh. Three metres would be more appropriate.
560.3	MCRAE Tim & Justine	Rule 14	Support	Retain and to be tied in with farm management plan
570.13	MILLER R L & S J Farm Trust	Rule 14	Support in part	Change the setback to 3 metres.
590.7	Mt Linton Station	Rule 14	Support	Retain.
596.1	My Farm Ltd & Associated Farms & Kerr Road Dairy Ltd	Rule 14(iii)(1)	Oppose Amend	The term riparian planting should be replaced with “riparian margin fenced to exclude stock.”
613.1	NZ Groundspread Fertilisers Association Inc.	Rule 14	Amend	That fertiliser can be spread to the fence that is protecting the waterway.
622.19	P F Olsen Ltd	Rule 14	Amend	Amend the rule to require pastoral fertiliser applications to be linked to a farm nutrient budget as part of an approved farm management plan (where required).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Develop a rule cascade to ensure that farmers applying phosphate based fertiliser test for cadmium and where levels exceed the national average of 0.65 mg Cd/kg, require the testing laboratory to report those tests to Council. Note: NZ's natural background level is 0.16mg Cd/kg of soil (range 0 – 0.77mg Cd/kg).</p> <p>Where cadmium levels approach trigger levels defined in Appendix 4 of MAF 2011, the activity status for application of phosphate fertiliser should move from Controlled (@ trigger value 'a' – 0.65mg Cd/kg) to Non-complying (@trigger value 'd' of 1.8mg Cd/kg at standard pH).</p>
645.1	PRICE William	Rule 14	Oppose	Rule is unnecessary, allow good farm management practices to ensure that no direct discharge of fertiliser into a waterbody occurs.
646.1	Progress Valley Farms Ltd	Rule 14	Oppose	A 3m buffer would be far better option so that crops and pasture can be fertilised rather than missing fertiliser on the outside 7m of paddock.
661.35	Ravensdown Ltd	Rule 14	Support in part	<p>Ravensdown seeks for the intent and permitted activity status of Rule 14 be retained.</p> <p>Ravensdown also seeks the following amendments to Rule 14:</p> <ol style="list-style-type: none"> <li>i. Either delete the term 'identified significant indigenous biodiversity site' from Clause (a)(iii)(2); or</li> <li>ii. Amend Clause (a)(iii)(2) to read (or similar): “... or within 10 metres of a wetland boundary or any identified significant indigenous biodiversity site <u>that includes surface water.</u>”</li> <li>iii. Add a new Rule 14A: “<u>The discharge of fertiliser in circumstances where fertiliser may enter water that does not meet the conditions of Rule 14 is a restricted discretionary activity. Council will restrict its discretion to the matters included in the permitted activity condition not met.</u>”</li> </ol>
672.3	ROBERTSON Antony	Rule 14	Support	Retain.
689.1	ROSS Keith	Rule 14	Oppose	Delete the proposed margin of 10 metres from a bed.
698.4	Rural Contractors of NZ (Graeme Mathieson)	Rule 14	Support	<p>Amend Rule 14 as follows:</p> <p>Rule 14 – Discharge of fertiliser <u>to land</u></p> <p>(a) The discharge of fertiliser <u>to land including</u> in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met...</p> <p>(b) The discharge of fertiliser <u>to land including</u> in circumstances where contaminants may enter water that does not meet the conditions of Rule 14(a) is a non-complying activity.</p>
708.1	Scandrett Rural Ltd	Rule 14	Amend	Suggest the term “riparian vegetation” be used instead of “riparian planting” or add a definition

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				of “riparian planting” which includes grass.
709.1	SCHMIDT D	Rule 14(iii)	Oppose	Leave as at present. Fertilise to fence line.
740.1	South Coast Dairy Ltd	Rule 14(iii)(1) & (2)	Support Amend	Consider a less restrictive rule for fertiliser discharge near a water body in hard to fence areas.
752.106	Southland Fish & Game Council	Rule 14	Support Amend	Retain Rule 14 as notified with the following amendment to Rule 14(a)(i): “(a) The discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met: 1. There is no direct discharge of fertiliser into a surface waterbody, <u>including wetland, water in an artificial watercourse, ephemeral or intermittent waterbody with an active bed,</u> or into groundwater.”
760.4	St Patricks Farms Ltd	Rule 14	Support Amend	Prescribe buffer zones rather than application rates is a good way to start.
775.1	Stoney Creek Station Ltd	Rule 14	Oppose	Rule is unnecessary as good farm management practices will ensure that no direct discharge of fertiliser into a waterbody occurs.
777.5	STRATFORD Chris & Lynsey	Rule 14	Oppose	Even where there are stock excluded riparian plantings, there should be a requirement to leave a buffer of 10 metres (including the riparian buffer zone). Some riparian strips are extremely close to waterways (in some cases barely more than one metre) and requiring no buffer does not appear to be best practice.
790.4	TAIT G R & J E & Waikawa Valley Trust	Rule 14	Oppose	Suggest 3m buffer more workable than 10m.
792.20	TAYLER Matthew	Rule 14	Support in part Amend	Condition amended or additional condition added allowing aerial application provided all practicable measures have been taken to limit fertilizer entering waterways/gullies. The landowner should be able to demonstrate this through their land management plan, or at worst, through a restricted discretionary consent.
801.1	Terrace Farm Trust & Johnrey Trust	Rule 14	Support	Retain.
803.36	The Fertiliser Association of NZ	Rule 14	Support in part Amend	Amend Rule 14 as follows: <b>Rule 14 – Discharge of fertiliser</b> (a) The discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(i) there is no direct discharge of fertiliser into a surface waterbody, water in an artificial watercourse or into groundwater; and</p> <p>(ii) there is no fertiliser discharged when the soil moisture exceeds field capacity; and</p> <p><u>(iii) there is no fertiliser discharged directly into or within 10 metres of the boundary of any identified significant indigenous biodiversity site; and.</u></p> <p><del>(iii)</del> (iv) where any permanently flowing river, lake, lagoon, estuary, artificial watercourse or wetland:</p> <p>(1) has riparian planting from which stock is excluded, fertiliser may be discharged up to the paddock-side edge of the riparian planting, but not onto the riparian planting, except for fertiliser required to establish the planting; or</p> <p>(2) does not have riparian planting from which stock is excluded, fertiliser is not discharged directly into or within 10 metres of the bed or within 10 metres of a wetland boundary <del>or any identified significant indigenous biodiversity site.</del></p> <p>(b) The discharge of fertiliser in circumstances where the fertiliser may enter water that does not meet the conditions of Rule 14(a) is a <del>non-complying</del> <u>restricted discretionary</u> activity.  <u>Council will restrict its discretion to the matters included in the permitted activity condition that are not met.</u></p>
807.1	The Terraces Ltd	Rule 14	Oppose	Rule is unnecessary as good farm management practices will ensure that no direct discharge of fertiliser into a waterbody occurs.
817.14	Tomogalak Gorge Trust (Jeffery Keen)	Rule 14	Support	Retain
818.15	Tomogalak Gorge Trust (John Keen)	Rule 14	Support	Retain.
819.14	Tomogalak Gorge Trust (Linzi Keen)	Rule 14	Support	Retain.
824.1	Tulloch Farm Glendhu Ltd	Rule 14	Oppose	Delete.
825.1	Tulloch McNab Transport Ltd	Rule 14	Oppose	Delete.
832.76	VAN GOOL Raewyn	Rule 14	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
843.3	Waikaia Plains Ltd	Rule 14	Support	Proscribe buffer zones rather than application rates, this is a good way to start. For the past 13 years no fertiliser has been required.
864.4	Whyte Partnership	Rule 14	Amend	Allow for top dressing using a plane where small amounts of fertiliser end up in the water.
865.3	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 14	Amend	Is a permitted activity as long as all fertiliser applications by air are accompanied by GPS coordinates. That aerial applications are restricted to xxxkg of product at one time.
868.13	Wilkins Farming Ltd	Rule 14	Support	Retain.
879.2	WILSON Kerry	Rule 14	Oppose	10 metres is unreasonable if anti-drift oils etc are used.

### Rule 15 – Discharge of stormwater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.35	Alliance Group Ltd	Rule 15	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.81	Aratiatia Livestock Ltd	Rule 15	Support	Retain.
48.32	Ballance Agri-Nutrients	Rule 15	Support	Retain.
108.75	BYTHELL Jesse	Rule 15	Support	Retain.
152.6	Clover Bell Ltd	Rule 15	Support	Retain.
209.28	DIPROSE Dave	Rule 15	Support	Add rule that any vehicle washing and additives do not directly enter storm water drains.
214.9	Donald Farm	Rule 15	Support	Retain.
249.22	Ernslaw One Ltd	Rule 15		<p>Confirm via clarification or advice note that the reference to <i>Roads</i> and <i>Parking Areas</i> in Rule 15 applies to storm water runoff in plantation forests from these areas, and additionally to any diffuse discharges that arise from earthworks associated with the construction of forestry roads, and from the grading or other cleaning of water tables on forestry roads during their service life.</p> <p>Add a Permitted Activity rule conditions relating to engineering standards (ie culverting) for rural roads &amp; tracks: Minimum culvert diameter of 325 mm (to minimise chance of blockages), with 4 to 20 culverts per km depending on soil type and road gradient and rainfall intensity (more at higher elevations, and more in Fiordland vs north eastern Southland). Clarify that Rule</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				15 applies to diffuse discharges during and immediately following the harvesting of areas of plantation forests.
265.81	Federated Farmers of NZ (Southland Province)	Rule 15	Oppose	Replace Rule 15 with Rule 11 and Rule 12 of the existing Regional Water Plan.
277.43	Fonterra Co-operative Group Ltd	Rule 15	Support	Retain.
279.65	Forest & Bird NZ	Rule 15	Support with amendment	Add <u>vii) The discharge does not reduce the water quality standard below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the reasonable mixing zone.</u> ”Apply above to 15a, b and c.
330.13	Gore District Council, Invercargill City Council and Southland District Council	Rule 15	Oppose Amend	Amend Rule 15 as follows: <b>Rule 15 – Discharge of stormwater</b> a. The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody, including an artificial watercourse, is a permitted activity provided the following conditions are met: i. the discharge is not from a reticulated system; ii. the discharge does not originate from industrial or trade premises where hazardous substances are stored or used unless: 1. hazardous substances cannot enter the stormwater system; or 2. there is an interceptor system in place to collect stormwater that may contain hazardous substances and discharge or divert it to a trade waste system; or 3. the stormwater contains no hazardous substances except oil and grease and the stormwater is passed through an oil interceptor system prior to discharge; and iii. the discharge does not contain any sewage, contaminants from on-site wastewater systems and mobile toilets, or agricultural effluent; iv. for discharges to a surface waterbody, the discharge does not result in: 1. the production of any conspicuous oil or grease films, scums, foams or floatable or suspended materials; 2. the rendering of freshwater unsuitable for the consumption by farm animals; 3. significant adverse effects to aquatic life;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>v. except for the discharge of stormwater from a roof, road or vehicle parking area, the discharge is not into water within natural state waters; and</li> <li>vi. for discharges to land, the discharge does not cause flooding, erosion, or land instability to any other person's property.</li> <li>b. The discharge of stormwater, <u>and the discharge of water from a reticulated stormwater network</u>, onto or into land in circumstances where contaminants may enter water or into a surface waterbody that does not meet one or more of the conditions in Rule 15(a); <del>excluding condition (a)(iii)</del> is a discretionary activity.</li> <li><del>e. The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody that does not meet Rule 15(a)(iii) is a non-complying activity.</del></li> </ul> <p>Alternatively, change Rule 5.</p>
337.13	Growplan Ltd	Rule 15		<further comment>
381.17	HOLDER Wendy & Tom	Rule 15(a)(iv)		Add 4 <sup>th</sup> point – does not reduce the quality of the water in the waterbody.
411.28	Invercargill City Council	Rule 15(b)	Oppose	Amend Rule 15 (b) to read: The discharge of stormwater, <u>and the discharge of water from a reticulated stormwater network</u> , onto or into land in circumstances where contaminants may enter water or into a surface waterbody that does not meet one or more of the conditions in Rule 15(a), <del>excluding condition (a)(iii)</del> is a discretionary activity.
411.29	Invercargill City Council	Rule 15(c)	Oppose	Delete Rule 15 (c).
449.18	KiwiRail Holdings Ltd (KiwiRail)	Rule 15	Amend	Amend as follows: (a) The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody, including an artificial watercourse, is a permitted activity provided the following conditions are met: ... (v) except for the discharge of stormwater from a roof, road, <u>rail</u> , or vehicle parking area, the discharge is not into water within natural state waters; and...
611.8	NZ Defence Force	Rule 15	Oppose in part	Add in a condition of Rule 15(a) as follows: “(vi) the discharge is from a temporary military training activity.”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
614.18	NZ Transport Agency	Rule 15	Support	Retain.
622.20	P F Olsen Ltd	Rule 15	Support Amend	Retain Rule 15 but add Permitted Activity Rule conditions related to adopting industry best practice codes and or align with such practices described in the proposed National Environmental Standard for Plantation Forestry.
661.36	Ravensdown Ltd	Rule 15	Support in part	Ravensdown seeks the intent and activity status in Rule 15(a) to be retained, and: <ul style="list-style-type: none"> <li>• seeks the activity status of Rule 15 (b) be amended to Restricted Discretionary Activity with Council restricting its discretion to the matters included in the conditions(s) not met; and</li> <li>• the activity status of Rule 15 (c) be amended to discretionary activity status.</li> </ul>
662.2	Rayonier NZ Ltd	Rule 15		The submitter supports proposed Rule 15 and seeks the following: <ol style="list-style-type: none"> <li>Clarification by way of advice note or redrafting, that the reference to roads and parking areas within Rule 15 applies to storm water run-off within plantation forests, and to any diffuse discharges arising from earthworks associated with the construction of forestry roads, and from the grading or cleaning of water tables on forestry roads; and</li> <li>Clarification by way of advice note or redrafting within Rule 15 that it applies to diffuse discharges during and following the harvesting of plantation forest; and</li> <li>Addition of a permitted activity condition that relates to the engineering standards for culverting in rural roads and tracks.</li> </ol> <p>The submitter suggests that reference to engineering standards for rural roads and tracks, such as the NZ Forest Owners Engineering Manual should be included as a permitted activity condition within rule 15.</p>
725.4	Silver Fern Farms Ltd	Rule 15	Support	Retain.
749.73	Southland Conservation Board	Rule 15	Amend	Amend (vi) to read: (vi) For discharges to land, the discharge does not cause flooding, erosion, or land instability to any <del>other person's</del> property.
750.13	Southland District Council	Rule 15		Clarify how this will be addressed and where the responsibility will lie for those contaminants entering the reticulated system. Practically, monitoring upstream and downstream is the only way to determine whether the effects of stormwater connections are being mitigated.
752.107	Southland Fish & Game Council	Rule 15	Support Amend	Amend Rule 15 to replace (a)(iv)(2) and (3) with clear and measurable standards. And Amend Rule 15 to provide:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>“(a)…  <u>(iv)(4) There is no conspicuous change to the colour and / or clarity of the receiving waters at the downstream edge of the reasonable mixing zone<sup>6</sup>.</u></p> <p><u>(vii) The discharge does not reduce the water quality standard below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the reasonable mixing zone.”</u></p> <p>(b) The discharge of storm water onto or into land in circumstances where contaminants may enter water or into a surface water body that does not meet one or more of the conditions in Rule 15(a), excluding condition (a)(ii), (iv) and (vii) - as proposed above) is a discretionary activity.”</p> <p>(c)The discharge of storm water onto or into land in circumstances where contaminants may enter water or into a surface water body that does not meet Rule 15(a)(iii), (iv) and (vii - as proposed above) is a non-complying activity.”</p>
797.36	Nga Runanga and TRONT	Rule 15	Support in part	<p>Amend (g):  (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaihai reserve or taiāpure.</u></p>
803.37	The Fertiliser Association of NZ	Rule 15	Support in part Amend	<p>Amend Rule 15 as follows:  (a) The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody, including an artificial watercourse, is a permitted activity provided the following conditions are met:  .....  (b) The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody that does not meet one or more of the conditions in Rule 15(a), excluding condition (a)(iii) is a <u>restricted</u> discretionary activity. <u>Council will restrict its discretion to the matters included in the permitted activity condition that are not met.</u></p>

<sup>6</sup> Reasonable mixing zone is defined in Glossary of the pWLP.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(c) The discharge of stormwater onto or into land in circumstances where contaminants may enter water or into a surface waterbody that does not meet Rule 15(a)(iii) is a <del>non-complying</del> <u>discretionary</u> activity.
817.15	Tomogalak Gorge Trust Jeffery Keen	Rule 15	Support	Retain
818.16	Tomogalak Gorge Trust (John Keen)	Rule 15	Support	Retain.
832.77	VAN GOOL Raewyn	Rule 15	Support	Retain.
895.52	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 15	Amend	Include a note as follows: <u>Note to plan users - Discharge permits are not required from Council when the discharge is into a reticulated stormwater system. This includes, but is not limited to, stormwater discharges from industry/trade premises, involving hazardous substances, where an effective interceptor system is in place, or where the discharge is otherwise authorised by the network operator under an existing consent or is provided for through a bylaw.</u>

### Rule 16 – Discharge of water from bores and wells

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.82	Aratiatia Livestock Ltd	Rule 16	Support	Retain.
108.76	BYTHELL Jesse	Rule 16	Support	Retain.
152.7	Clover Bell Ltd	Rule 16	Support	Retain.
214.10	Donald Farm	Rule 16	Support	Retain.
258.10	Eyre Creek Ltd	Rule 16	Support	Retain.
259.6	F D Enterprises Ltd	Rule 16(b)	Amend	There is no conspicuous change to the colour and/or clarity of receiving waters at a distance of 20 metres from the point of discharge <u>with the exception of testing wells.</u>
449.19	KiwiRail Holdings Ltd (KiwiRail)	Rule 16	Support	Retain.
614.19	NZ Transport Agency	Rule 16	Oppose	The discharge of water from any bore or well into a surface waterbody or water in an artificial watercourse or onto or into land where it may enter a surface waterbody or water in an artificial

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				watercourse, as a result of aquifer testing, is a permitted activity provided the following conditions are met:
656.2	RABBIDGE Stephen	Rule 16 (a)	Amend	Enforce a requirement of a Management Plan on non-compliant farmers only.
737.16	Smithill Ltd	Rule 16	Support	Retain.
752.108	Southland Fish & Game Council	Rule 16	Support	Retain.
792.21	TAYLER Matthew	Rule 16	Support	Retain.
817.16	Tomogalak Gorge Trust (Jeffery Keen)	Rule 16	Support	Retain
818.17	Tomogalak Gorge Trust (John Keen)	Rule 16	Support	Retain.
819.15	Tomogalak Gorge Trust (Linzi Keen)	Rule 16	Support	Retain.
832.78	VAN GOOL Raewyn	Rule 16	Support	Retain.
868.14	Wilkins Farming Ltd	Rule 16	Support	Retain.
869.4	WILKINS Pam	Rule 16	Support	Retain.

### Rule 17 – Dust suppressants

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.36	Alliance Group Ltd	Rule 17	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.83	Aratiatia Livestock Ltd	Rule 17	Support	Retain.
48.33	Ballance Agri-Nutrients	Rule 17	Support	Retain.
108.77	BYTHELL Jesse	Rule 17(a)(i)(2)		I seek the addition of the following phrase in Rule 17 clause (a)(i)(2) ‘or naturally occurring wetland’ added so it reads ‘not within 20 metres of a surface waterbody, the Coastal Marine Area, a bore or soak hole or <u>naturally occurring wetland</u> ; or’

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
118.3	Carmyllie Farm	Rule 17	Oppose	No specific decision requested.
152.8	Clover Bell Ltd	Rule 17	Support	Retain.
158.1	Colin Woodrow Ltd	Rule 17	Oppose	I would like this rule to be changed so we can still use used oil.
160.4	COLLING Megan	Rule 17	Oppose	Delete
197.7	DEVINE Wade	Rule 17	Oppose	Strike out. Waste oil or re-refined oil used properly on roadways should be permitted.
209.29	DIPROSE Dave	Rule 17	Support	Do a cost analysis on waste oil in regards to other substances and the cost of making waste oil less toxic by processing the product to be more suitable for road suppression of dust.
214.11	Donald Farm	Rule 17	Support	Retain.
249.23	Ernslaw One Ltd	Rule 17	Oppose Amend	Amend Rule 17 by: Deleting reference to: 'new light fuel or new lubricating oil' but incorporate reference to 'Magnesium Chloride based dust suppressants'.
258.11	Eyre Creek Ltd	Rule 17	Support	Retain.
265.82	Federated Farmers of NZ (Southland Province)	Rule 17	Support	Retain.
288.30	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 17	Support	Retain.
348.4	HAMILTON Blair	Rule 17	Amend	Doesn't make sense putting vegetable oil, fuel and new oil on land. If you don't include roads they are excluded.
352.2	HAMMOND Emma & Peter	Rule 17		Remove the use of new light fuel or lubricant.
479.2	Lowburn Ag Ltd (Birgit Pemberton)	Rule 17a (i)	Oppose	Allow the use of old oil.
480.4	Lowburn Ag Ltd (Jonathan Pemberton)	Rule 17(a)		Remove the limit to only use new oil.
622.21	P F Olsen Ltd	Rule 17	Oppose Amend	Amend Rule 17 by deleting reference to: new light fuel or new lubricating oil. Include options for other products/solutions.
640.34	Pourakino Catchment Group	Rule 17	Oppose part in	<del>(1) (i) the discharge is only of vegetable oil, or of new light fuel or new lubricating oil and is:</del>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
737.17	Smithill Ltd	Rule 17	Support	Retain.
750.14	Southland District Council	Rule 17	Amend	Amend to clarify that bitumen type seals (including ottoseal and conventional seal) are not considered under this rule.
752.109	Southland Fish & Game Council	Rule 17	Support	Retain.
773.4	STEWART Rory	Rule 17	Support	Retain.
790.5	TAIT G R & J E & Waikawa Valley Trust	Rule 17	Oppose	We understand the benefits of using new or vegetable oils compared to used oil but extra cost on us is not acceptable – we suggest the logging company accept some responsibility for this cost!
810.32	Three Rivers Catchment Group (TRCG)	Rule 17	Oppose in part	(1) <del>(4)</del> the discharge is <del>only of vegetable oil, or of new light fuel or new lubricating oil and is:</del>
817.17	Tomogalak Gorge Trust (Jeffery Keen)	Rule 17	Support	Retain
818.18	Tomogalak Gorge Trust (John Keen)	Rule 17	Support	Retain.
819.16	Tomogalak Gorge Trust (Linzi Keen)	Rule 17	Support	Retain.
832.79	VAN GOOL Raewyn	Rule 17	Amend	Add – permits must be held if required by relevant District/Urban councils.
868.15	Wilkins Farming Ltd	Rule 17	Support	Retain.

### Rule 18 – Discharge of water from purging of instruments at a water treatment plant

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.37	Alliance Group Ltd	Rule 18	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.84	Aratiatia Livestock Ltd	Rule 18	Support	Retain.
152.9	Clover Bell Ltd	Rule 18	Support	Retain.
214.12	Donald Farm	Rule 18	Support	Retain.

287.2	FREW Mervyn	Rule 18	Support	Retain
749.74	Southland Conservation Board	Rule 18	Amend	Add a provision to Rule 18 to impose a condition (e) to ensure that any increase in temperature from this activity is controlled.
752.110	Southland Fish & Game Council	Rule 18	Support	Retain.
817.18	Tomogalak Gorge Trust (Jeffery Keen)	Rule 18	Support	Retain
818.19	Tomogalak Gorge Trust (John Keen)	Rule 18	Support	Retain.
819.17	Tomogalak Gorge Trust (Linzi Keen)	Rule 18	Support	Retain.
832.80	VAN GOOL Raewyn	Rule 18	Support	Retain.

#### Rule 19 – Discharge of water associated with water treatment processes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.38	Alliance Group Ltd	Rule 19	Oppose in part	Better clarify the relationship and resulting activity status between the various discharge rules. Delete rules that are unnecessarily duplicated.
24.85	Aratiatia Livestock Ltd	Rule 19	Neutral	Retain.
214.13	Donald Farm	Rule 19	Support	Retain.
279.66	Forest & Bird NZ	Rule 19	Support with amendment	Add y) <u>The discharge does not reduce the water quality standard below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the reasonable mixing zone.”</u>
611.9	NZ Defence Force	Rule 19	Support in part	Add a permitted activity rule to expressly provide for discharges from temporary military training activities:  <u>“Discharges from military use of portable water treatment plants during temporary water supply into freshwater, to land or to the coastal marine area, except discharges to Regionally Significant Wetlands identified in Appendix A”</u>  And the following permitted activity standards:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(a) <u>“Cleaning and disinfectant rinse shall be discharged to land only and shall not enter any surface waterbody or coastal marine area by overland flow.</u></p> <p>(b) <u>The discharge shall not cause erosion at or adjacent to the discharge point.</u></p> <p>(c) <u>The discharge shall not give rise to any flooding of land or assets upstream of the discharge point under any conditions.</u></p> <p>(d) <u>The discharge shall not cause exceedance in trigger values for 95% species protection for substances that are toxic to aquatic ecosystems (as measured relative to the Australian and New Zealand Guidelines for Fresh and Marine Water Quality, 2000) in receiving water bodies after reasonable mixing;</u></p> <p>(e) <u>The discharge shall meet the following water quality standards 20 m downstream of the discharge point:</u></p> <p>(i) <u>No conspicuous change in the colour or visual clarity of the receiving water;</u></p> <p>(ii) <u>No emission of objectionable odour;</u></p> <p>(iii) <u>No production of conspicuous oil or grease films, scums or foams, or floatable materials;</u></p> <p>(iv) <u>No rendering of fresh water unsuitable for consumption by farm animals;</u></p> <p>(v) <u>No significant adverse effects on aquatic life.</u></p> <p>(f) <u>The Consent Authority is notified no less than 10 working days prior to the activity commencing, and provided details of the activity including the dates the activity will be undertaken and discharge location”</u></p>
749.75	Southland Conservation Board	Rule 19	Amend	Add a provision to Rule 19 to impose a condition (d) to ensure that any increase in temperature from this activity is controlled.
752.111	Southland Fish & Game Council	Rule 19	Support	Retain.
792.22	TAYLER Matthew	Rule 19	Oppose	Additional condition added under c) “no significant deterioration in observed N, P and e coli concentrations in the waterway” and “the rendering of freshwater unsuitable for human consumption”.
793.2	TAYLER Phillip	Rule 19	Amend	Standards of rule 19 need to be comparable to NES for drinking water and swimmable.
817.19	Tomogalak Gorge Trust (Jeffery Keen)	Rule 19	Support	Retain
818.20	Tomogalak Gorge Trust (John Keen)	Rule 19	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
819.18	Tomogalak Gorge Trust (Linzi Keen)	Rule 19	Support	Retain.

## Rule 20 - Farming

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
1.1	A J & S R Currie Ltd	Rule 20	Oppose	More people on the ground to oversee proactive farmers.
11.3	Agribusiness Consultants Ltd	Rule 20		Delete Rule 20 and support, collaborate, fund FMP field days for voluntary attendees. In our experience there is a high demand for unregulated FMPs and a healthy market place already exists for this. We would support a fair/reasonable rate charging to achieve these means.
12.1	Agricentre South Ltd	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
14.3	ALLAN Frazer & Karen	Rule 20	Amend	Clarification around what will happen to this zone after 30 May 2019.
23.1	Apolima Farms Ltd	Rule 20	Support	However the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
24.86	Aratiatia Livestock Ltd	Rule 20	Support	Retain.
25.25	Ardel Dairies Ltd	Rule 20	Oppose	Removal of rule. Industry led Best practise should be adhered to.
26.9	Ardoyne Farm Dairys	Rule 20	Support	Amend farm plan requirements to reduce cost and time to farmer.
29.1	Austin Brothers (Electrical and Pumping)	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
31.4	AYERS Warren	Rule 20	Amend	Remove any reference to intensive winter grazing.
31.5	AYERS Warren	Rule 20	Amend	Change 20ha to 5ha.
33.3	BACON V M	Rule 20	Oppose	That properties be defined by their largest physiographic zone and that dates be pushed out to 2025.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
40.6	BAKER David	Rule 20	Oppose	Drop the management plan in accordance with appendix N and use the land sustainability officers to do focus farm plans and work with farmers to ensure best practice is achieved. Peer Review Overseer using different independent soil scientist.
42.1	BAKER Rory	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
46.1	Balfour Engineering Ltd	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
47.10	Balfour, Wendonside & Waikaia Group	Rule 20	Oppose in part	Amend the rule to request copies of Management Plans within a set timeframe i.e. between May – August each year. Seek security from ES of the privacy of information within a Management Plan.
48.34	Ballance Agri-Nutrients	Rule 20	Support in part	Support the intent of Rule 20. Amend to refer to Farm Management Plans. The submitter highlights repetition or overlap with Rule 20 (e) and clauses (f), (g) and (h). Amend non-compliance with clauses (f), (g) and (h) of Rule 20 to be a restricted discretionary activity, rather than a discretionary activity. See original submission for detail. Oppose the timeframes required to prepare Nutrient Budgets and Farm Environmental Plans and seeks to ensure that Southland Regional Council must carefully consider the timeframes, in consultation with affected parties, implementing timeframes that are appropriate and achievable. See original submission for detail
49.3	BARCLAY Todd (Member of Parliament – Clutha Southland)	Rule 20		I support the use of Farm Management Plans to help farmers to meet the need to farm within good management practices, instead of being required to farm under a consenting regime. However I do not wish to see these Plans become a major regulatory exercise for farmers which requires extensive office time, or engagement of consultants to produce them.  Therefore I ask Environment Southland to look closely at the contents of the Farm Management Plans listed in Appendix N and ensure that the requirements are limited to elements listed in Appendix N, and I also have concerns about the cost-benefit of requiring a nutrient budget from Overseer for all farms over 20ha.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Finally, if Environment Southland is asking that all farmers submit their plans, there needs to be certainty that privacy of farmers is respected, and there needs to be a purpose for holding the plans. I suggest that requesting a copy of the Farm Management Plan from a specific farmer in response to an identified issue may be a less imposing approach.
56.4	BEATTIE Michael & Lynley	Rule 20	Oppose	More lead in time is required to complete and implement management plans.
57.1	Beaumont Station (Glen Minty)	Rule 20 (f), (g)	Oppose	Remove the mandatory requirement for a 'Management Plan' for every farmer. Make the Management Plan a requirement only for identified and high risk areas. Concentrate efforts on continued education on environmental concerns, based on facts not conjecture (there is a lot of confusing and unsubstantiated material published in the media). Provide incentives for farmers to 'go that extra step' and publicise these.
58.1	Beaumont Station (Lynn Minty)	Rule 20 (f) & (g)	Oppose	Remove the mandatory requirement for a 'Management Plan' for every farmer. Make the Management Plan a requirement only for identified and high risk areas. Concentrate efforts on continued education on environmental concerns, based on facts not conjecture (there is a lot of confusing and unsubstantiated material published in the media). Provide incentives for farmers to 'go that extra step' and publicise these.
59.1	Beaumont Station (Struan Minty)	Rule 20 (f) & (g)	Oppose	Remove the mandatory requirement for a 'Management Plan' for every farmer. Make the Management Plan a requirement only for identified and high risk areas. Concentrate efforts on continued education on environmental concerns, based on facts not conjecture (there is a lot of confusing and unsubstantiated material published in the media). Provide incentives for farmers to 'go that extra step' and publicise these.
62.8	Beef + Lamb NZ	Rule 20	Oppose Amend	Amend to read:  a) The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.  <del>b) Until 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity.</del>  <del>c) Until 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity.</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>d) Until 30 May 2020, the use of land for a farming activity in the Old Maitaura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity.</del></p> <p>e) <u>(b)</u> Despite any other rule, from 30 May 2025<del>18</del> the use of land for the farming of sheep, deer or beef on a landholding that is between 20 hectares and 100 hectares in area is a permitted activity, provided the following condition is met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, <del>and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>f) From 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>g) From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>h)</del> (c) From 30 May 2020<del>25</del>, the use of land for a farming activity <u>on a landholding that is greater than 100 hectares</u>, in the Old Maitava or Lignite Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</p> <p>i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, <del>or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>i)</del> From 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(e) or Rule 20(f) is a discretionary activity.</p> <p><del>j)</del> From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(g) is a discretionary activity.</p> <p><del>h)</del> (d) From 30 May <del>2020</del> 2025, the use of land for a farming activity <del>in the Old Maitava or Lignite Marine Terraces Physiographic Zones</del>, other than dairy farming of cows or intensive winter grazing, that does not comply with the conditions of Rule 20(a)(b)(c) is a discretionary activity.</p>
63.3	BEGGS N W & C E	Rule 20	Neutral	Consideration be given to how Farm Management plan enforcement is structured, in relation to the most relevant party to do so. This should be those most familiar with the current property management, which is not necessarily the landowner.
64.12	BELGARD Family Trust (GA & JM Rauber)	Rule 20	Oppose	Farm management should not be decided on size of a property.
67.2	Benmore Downs Ltd	Rule 20	Oppose	No specific decision requested.
70.2	Betapahu Farms Ltd	Rule 20		Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
74.2	BLACK G L & R R	Rule 20	Support in part Amend	We support the concept of farm plans in principle. We recommend that Environment Southland keep farm plans simple in structure and practical to implement.
79.2	BLAIR Phillipa Mary	Rule 20	Oppose	This should apply to all farmed ground including lifestyle blocks and continued scientific work as work with individual farms should be encouraged.
80.17	BLAKELY Barney & Stephanie	Rule 20	Oppose	This rule should be changed to include the farm size in relation to stock unit carrying capacity.
81.20	BLAKELY Hamish & Hannah	Rule 20(c)	Oppose	This rule should be changed to include the farm size in relation to stock unit carrying capacity.
83.2	BOKSER Greg	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
84.1	BOLE Will	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
85.2	BOWMAR Lindsay & Joanne	Rule 20	Oppose	Remove time enforcements completely until such time all urban people fully understand how much they are contributing towards polluting our waterways.
86.3	BOWMAR Ross	Rule 20	Oppose	Spend 4-5 years discussing with farmers the impact on their individual farming business prior to implementing the rule.
88.1	BRAITHWAITE Nathan	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.28	BRENTLEIGH Family Trust	Rule 20	Oppose	Remove Physiographic Zones & Farm Management Plans from the plan. If not fully removed FMP should be for a 5 year period and not include Overseer.
90.1	Brian Mahon Engineering	Rule 20	Oppose	Delete all farming restrictions base on Physiographic zones and delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
91.2	Bridesdale Farming	Rule 20	Oppose	The Council needs to outline how they came to the cost of consenting.
92.7	Bristol Grove Dairies	Rule 20	Oppose	Landholders need to have the facility to demonstrate their property may be in a different physiographic zone.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
93.2	Broadacres Ltd	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
94.3	Brooklea Farm Ltd	Rule 20	Oppose Support	Support treating all zones equally. We support the rule which lets existing farms continue. We would support that ES look to implement all farmers have a farm management plan and follow good practices rather than by consent. Farm management plan would be specific to individual farms and reflect that all farmers and their businesses are different – gives greater input to best manage their properties.
99.2	BUCKINGHAM Greta	Rule 20	Oppose	Replace with continued education and collaboration with the land sustainability team on a farm by farm basis which will improve the environment without the need for blanket rules and expensive plans.
100.2	BUCKINGHAM Janette	Rule 20	Oppose	The 20ha cut off is far too high and should be reduced to 1ha to ensure all lifestyle farmers are also included. Or better still scrapped altogether and left as voluntary requirements to access funding for environmentally friendly projects, as has been the case.  Physiographic zones are incorrect and not fit for purpose.  Continued education and collaboration with the land sustainability team on a farm by farm basis will deliver effective results tailored to individual farmers. This will both enhance these farms and improve the environment without the need for blanket rules and expensive plans.
101.2	BUCKINGHAM Thomas	Rule 20	Oppose	The 20ha cut off is far too high and should be reduced to 1ha to ensure all lifestyle farmers are also included. Or better still scrapped altogether and left as voluntary requirements to access funding for environmentally friendly projects, as has been the case.  Physiographic zones are incorrect and not fit for purpose.  Continued education and collaboration with the land sustainability team on a farm by farm basis will deliver effective results tailored to individual farmers. This will both enhance these farms and improve the environment without the need for blanket rules and expensive plans.
103.6	BYARS A R & L J Trust	Rule 20(a)	Oppose	Delete Rules 20(a) and 20(e); Amend Rule 20(d) so there is no cost to farmer for changes to zones.
107.3	BYARS Richard	Rule 20	Oppose	Extend timeframes.
108.78	BYTHELL Jesse	Rule 20	Support	Retain.
109.1	C F L Farms Ltd	Rule 20	Oppose	Give incentives to farmers who are prepared to be self-sufficient and have no need to rely on the dairy sector for income. And look at initiating inside wintering systems for dairy farmers during winter. For a start this will make roads safer and cleaner.
114.2	CALLAHAN Pamela	Rule 20	Oppose	Remove consenting and FEP requirements and allow the continued good work of the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				sustainability team as it would be more beneficial to our farm allowing us to spend money on fencing and plantings instead of administration and expensive plans.
118.4	Carmyllie Farm	Rule 20	Oppose	Farm management plans - what level of detail is appropriate? Should a nutrient budget be required for all farm types? Limit to areas for intensive winter grazing, currently 20 or 50ha limits. Should there be a percentage of landholding limit for larger farms?
119.1	Carnie Farms	Rule 20	Oppose	Timeframe needs to be pushed out to at least 2025. Remove management plan, not needed for farmers to work their own land.
123.2	Caughey Ltd	Rule 20	Oppose	The timeframes are too small for me to comply. I think the dates should be pushed out to 2025.
135.2	CLARKE A W & T M Partnership	Rule 20	Amend	Amend time frames to prepare management plan.
144.2	CLEARWATER Sue	Rule 20	Oppose	Re-evaluate the proposed system. I oppose this in relation to my opposition to the proposed "physiographic" zoning.
150.3	CLIFFORD Mervyn & Judy-Ann	Rule 20	Oppose	ES supplies us with maps and templates for farm management plan. I am sure they have aerial maps of our places. Extend timeline on farm management plans. Instead of requiring compliance, use parts of this plan as a guideline for good management practice.
152.10	Clover Bell Ltd	Rule 20		This rule should be formed around a management plan described in Appendix N and developed from good farming practice.
156.6	COCKBURN Grant & Rachel	Rule 20	Support	Clarify that the L & W plan is in alignment with the future limit setting process and that it will be based on PZs. To support this show some farming systems that are likely to 'fit' the proposed limit setting, via the overseer model.
157.2	COGHLAN K P & W A	Rule 20	Oppose	I am firmly opposed to compulsory management plans.
158.2	Colin Woodrow Ltd	Rule 20	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years. This would pick up issues on farms and create good working relationships, without hassles of compliance officers being involved.
159.3	COLLING Leigh	Rule 20	Oppose	Extend – longer timeframe required to get the required work done.
160.5	COLLING Megan	Rule 20	Oppose	Auditing should be done approx. 3 years apart not annually, clarify how rules will be enforced, extend time frames.
161.3	COLLINS Gary	Rule 20	Oppose	Longer time frame between management plans.
162.3	COLLINS Rachael	Rule 20	Oppose	Longer time frame between management plans.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
163.1	CONLAN Eddie & Judy Family Trust	Rule 20	Support	Retain.
164.1	Conlan Farming	Rule 20	Support	Oxidising zone left out of restricted plan.
172.15	COWAN Les & Christine	Rule 20	Oppose	Remove requirement to complete a management plan or consent.
173.2	COWIE Martin	Rule 20	Oppose	We do not want the task of submitting a farm management plan to be time consuming and costly. Any fees have to be scaled to the size of the farm. The 20ha cut off is far too high and should be reduced to 1ha to ensure all lifestyle farmers are also included. Or better still scrapped all together and left as voluntary requirements to access funding for environmentally friendly projects.
175.2	CRACK Stephen	Rule 20	Oppose	Delete as these activities should be covered as per Federated Farmers recommendations.
176.3	Crayburn Farm Trust	Rule 20	Oppose	Remove Appendix N7 cultivation.
183.1	CUTHBERTSON John	Rule 20	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.1	CUTHBERTSON Shane	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points
186.4	D R & J A E Pullar Ltd	Rule 20(e)	Oppose	Delete.
189.31	Dairy Holdings Ltd	Rule 20	Support	Retain.
191.7	DALE J M & K B	Rule 20	Amend	Best practice for arable farming to be reflected in this plan to inhibit nutrient and soil loss. Environment Southland must consider the financial, economic and social repercussions to Southland.
192.7	DALE P T & S B Trust	Rule 20	Oppose	We do not support your approach to high intensity farming including dairying.
194.1	Davie Justin	Rule 20	Oppose	Far too much time and money to be spent annually. Better off with a simple plan farmers can do themselves with a compliance check every 5 years. Make it easy to update changes without the requirement to do it annually, essentially from square 1 again.
195.3	DAVIE Stuart	Rule 20	Oppose	I would like to see this requirement withdrawn from the plan completely.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
196.2	DE BOER Frido	Rule 20	Oppose	Don't audit EMP.
198.2	DIACK Hugh	Rule 20	Support Amend	Retain Rule 20, but clarify within the Plan which date (i.e. the first or last) a management plan should be prepared by for farms are in more than one physiographic zone.
200.2	DICKIE Alton Brent	Rule 20	Oppose	Push out all dates to 2025.
204.2	DICKSON Grant	Rule 20	Oppose	Push out all dates to 2025
205.24	Dillon Ag Ltd (Chris Dillon)	Rule 20	Oppose	Winter grazing should be a permitted activity with GMP. Remove Physiographic Zones and Farm Management Plans from the plan. If not fully removed FMP should be for a 5 year period and not include Overseer.
206.24	Dillon Ag Ltd (Rochelle Dillon)	Rule 20	Oppose	Winter grazing should be a permitted activity with GMP. Remove Physiographic Zones and Farm Management Plans from the plan. If not fully removed FMP should be for a 5 year period and not include Overseer.
207.4	Dillon Grain Ltd	Rule 20	Oppose	Any limits imposed should be across the board. This would maintain an even economic playing field.
209.30	DIPROSE Dave	Rule 20	Oppose	That the minimum land holding be dropped to 5ha.They are farming stock and need to show responsibility towards the land and water. That between 5-20 ha they should have a light management plan. This should include stock, fertilizer applied, supplement removed added, sprays. This should be on request from Environment Southland like the bigger land holdings. That the stocking rate does not exceed (x) stock units / ha between the months May - September inclusive.
210.82	Director-General Conservation	of Rule 20	Support in part	Amend Rule 20 to include other intensive farming activities that can have significant adverse effects on water quality through the transport of significant quantities of contaminants by key flow pathways too sensitive receiving environments.  Amend Rule 20 as follows: (a) ... (b) Until 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands ( <u>excluding natural wetlands</u> ) Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity. (c) .... (i) From 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands <u>except natural wetlands</u> Physiographic Zones, other than dairy farming of cows or

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				intensive winter grazing, that does not comply with the condition of Rule 20(e) or Rule 20(f) is a discretionary activity. (j) ...
212.1	DODD N R & J L	Rule 20	Oppose	That the timeframe/date are pushed out to 2025 to give more time for ES to discuss and work out this rule with farmers.
218.1	Drumderg Farm & Melgan Ltd	Rule 20		Having to provide a farm management plan of some type is a good idea. This needs to be as simple as possible with only the need to update it each year. These have the potential to be large cumbersome documents so please only make us include what is vital. I think your deadline which would be 2018 for us is a bit soon. Please give us more time to implement these plans.
220.13	Drylands Farming Ltd	Rule 20	Oppose	Provide proof that the science behind physiographic zones will have environmental benefits before farms are used as lab rats.
221.13	DRYSDALE Family Trust	Rule 20	Oppose	Provide proof that the science behind physiographic zones will have environmental benefits before farms are used as lab rats.
222.1	DUFF Bradon	Rule 20	Oppose	Delete Management Plan requirement, I believe I should not need a management plan to farm.
223.1	DUFF Farms	Rule 20		Keep the Management Plan down to a single page of data, so it can be done by all farmers quickly.
224.5	DUFFY Paul	Rule 20		Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils. The consent process needs to be straight forward, simple, not expensive for farmers and well explained.
225.1	DUGDALE Peter	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
231.2	DYER Stephen	Rule 20	Oppose	Delete requirement for a Farm Management Plan.
233.6	DYSON Valerie &Glyn	Rule 20	Amend	Keep the requirement of a Management Plan. The use of land for farming activities (regardless of physiographic zone) requires a management plan by 30 May 2018. Delete reference to physiographic zones.
237.1	Eaton Willow Lodge (Brent Eaton)	Rule 20		The need for consent is unnecessary.
238.1	Eaton Willow Lodge	Rule 20	Oppose	The need for consent is unnecessary.

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	(Derek Eaton)			
239.1	Eaton Willow Lodge (Paul & Elaine Eaton)	Rule 20	Oppose	The need for consent is unnecessary.
240.1	EDIE Partnership	Rule 20	Amend	ES should provide free consultants to help farmers with constructing their management plans and no fee should be incurred.
243.1	ELS Luren	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
244.1	Elya Holdings Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
246.1	ENGLISH Hamish	Rule 20		Defer land use rules until limit setting process.
247.9	Environment Southland	Rule 20	Amend	<p>Amend (d)(h) (k) as follows:... Old Matura, <del>or</del> Lignite Marine Terraces, <u>or Alpine Physiographic Zones</u>... As a minor amendment, group the provisions relevant to each physiographic zone together i.e. (b) (f) (i) become (b) (c) (d), (c) (g) (j) become (e) (f) (g), and (d) (h) (k) become (h) (i) (j).</p> <p>Add an advice note to clarify that the earliest date which applies to a landholding is the relevant date.</p> <p>Delete Rule 20 (e) and insert Rules 20(f)(ii), (g)(ii), (h)(ii) which read: <u>On land holdings between 20 hectares and 100 hectares in area where intensive winter grazing is not undertaken, a Farm Environmental Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which included mitigations relevant to the farming type being undertaken and relevant physiographic zones, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p> <p>Additionally, amend Rules 20 (f)(i), (g)(i),(h)(i) to read: <u>On landholdings greater than 100 hectares in area, or landholdings between 20 hectares and 100 hectares in area where intensive winter grazing is undertaken, a Farm Environmental Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farm activity and the property on which the activity is</u></p>

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				<p>undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</p> <p>There is also a reference to Rule 20(e) in Rule 20(i) which should be deleted.</p> <p>Amend references to 'Farm Management Plan' to read 'Farm Environmental Management Plan'.</p> <p>Amend Rule 20(b)-(k) remove the words 'or intensive winter grazing', wherever it appears.</p> <p>Amend 30 May to 1 May where it appears.</p>
252.1	EVANS Blair	Rule 20(f) & (g)	Amend	Either align the dates from 30 May 2019, or have a percentage area of farmed land, i.e. if over 70% of your farmed area falls into one Zone then please follow that Zone date.
253.2	EVANS Frederick & BROCKMAN Carla	Rule 20	Oppose	No specific decision requested. Submitter concerned about timeframes.
257.2	EVANS O R & T D	Rule 20	Amend	<p>Amend so plan does not need updated if same approved farming practice is in place.</p> <p>All taxpayers should pay for the cost of these plans if we are forced to do this as it is supposedly for the benefit of all New Zealanders.</p>
258.12	Eyre Creek Ltd	Rule 20	Oppose in part	<p>Any regulation needs to be delayed until necessary due diligence is achieved from scientific, economic and social perspectives. Something like but not limited to the Southland Economics Project this may take 5-10 years then so be it. Regulation should not be applied until such point and only IF deemed necessary by relevant independent bodies. In the interim adoption of best practice policies will go a lot further than the proposed regulation would in 'holding the line' of water quality.</p> <p>Any regulation needs to be determined and monitored by something like but not limited to local catchment bodies, NOT Environment South. People who are qualified and familiar with local practice &amp; and subsequent effects concerned. A model like but not limited to Overseer in which a farmer can monitor inputs and outputs.</p> <p>Consent timeframes need to be as long as practically possible. Ie anything less than 20 years poses uncertainty in a farming model and can compromise the ability to derive income and subsequently farm values. Five year reviews could be beneficial for both parties to assess standings and potential improvements. Outcomes from these reviews are to be constructive suggestions and NOT to be legally binding.</p>
259.7	F D Enterprises Ltd	Rule 20	Oppose in part	I suggest that there is a template made available for farmers to make the process easier. I request that council provide justification for their estimated consenting cost as outlined in the



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				Section 32 report.
261.3	Fairmount Perendale Stud Farm	Rule 20	Oppose Amend	Need to work closely with the land owners to find mutually satisfactory solutions. More reasonable policies are necessary otherwise leave it as status quo.
262.2	Fairview Eastern Bush Ltd	Rule 20	Amend	Amend to 5-10 yr management plans with free advisers
264.5	FarmRight Ltd	Rule 20	Support in part	Support management plan requirement. We suggest that there is a template made available for farmers to follow and complete themselves.
265.83	Federated Farmers of NZ (Southland Province)	Rule 20	Support in part	<p>Amend as follows:</p> <p>(a) The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.</p> <p>(b) Until 30 May 2018, the use of land for a farming activity <u>other than dairy farming of cows</u> <del>in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing,</del> is a permitted activity.</p> <p>(c) Until 30 May 2019, the use of land for a farming activity <u>in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing,</u> is a permitted activity.</p> <p>(d) Until 30 May 2020, the use of land for a farming activity <u>in the Old Maitava or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing,</u> is a permitted activity.</p> <p>(e) Despite any other rule, from 30 May 2013 the use of land for <u>the farming of sheep, deer or beef on a landholding that is between 20 hectares and 100 hectares in area a farming activity, other than dairy farming of cows,</u> is a permitted activity, provided the following condition is met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, <del>but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone,</del> and provided to Environment Southland upon request <u>when a compliance issue arises, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p> <p>(f) <del>From 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p>(i) <del>a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and</del></p>

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				<p><del>provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>(g) From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>(h) From 30 May 2020, the use of land for a farming activity in the Old Mataura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the Proposed Southland Water and Land Plan Page 50</del></p> <p><del>farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>(i) From 30 May 2018, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(e) or Rule 20(f) is a discretionary activity.</del></p> <p><del>(j) From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(g) is a discretionary activity.</del></p> <p><del>(k) From 30 May 2020, the use of land for a farming activity in the Old Mataura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(h) is a discretionary activity.</del></p>
266.4	Fenham Downs Ltd	Rule 20	Oppose	Management plan – clarify who is going to come and do it, who is going to pay for it to get done.
268.1	Fermoy Holsteins Ltd	Rule 20	Amend	A three yearly management plan with cultivation records updated as required.
277.44	Fonterra Co-operative Group Ltd	Rule 20	Oppose in part	Retain Rule 20 as a permitted activity rule for farming (other than the farming of dairy cows).

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				Amend Rule 20 as follows: “Rule 20 – Farming (a) <u>Land that is primarily used for the disposal of wastewater or liquid waste from an industrial or trade process and a resource consent has been granted for that discharge that limits nitrogen loss from all uses of that property shall be exempt from Rule 20 – Farming.</u> <del>(a)</del> (b) The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.” ...renumber subsequent rules accordingly.
279.67	Forest & Bird NZ	Rule 20	Support	Add intensive horticulture to 20 (a).
291.1	G J Gardner	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
292.14	G S & M A Clearwater Ltd	Rule 20	Amend	I support the council’s approach of implementing Farm Management Plans (FMP) and strongly support FMP versus a consent biased process. However, I would recommend for FMP to become a template in which farmers complete rather than a consultant.
296.4	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 20(d)		Amend so dairy farming and winter grazing is a discretionary activity.
297.9	GARDYNE Hugh & Kathie	Rule 20		Amend to align with general submissions [see submissions in general comments section].
298.3	GARDYNE Joanne	Rule 20	Oppose	That the physiographic zones sit outside the plan until they are fully peered review and land owners have had the opportunity and time to dispute boundaries between zones within their property. It is unfair at this stage putting restrictions on the Old Matura and Peat wetlands until the limit setting process has taken place.
299.14	GARDYNE John	Rule 20	Oppose	Use GFM with plans as opposed to physiographic zones.
300.14	GARDYNE Jonathan	Rule 20	Oppose	Remove the need for farm management plans.
306.1	GIBSON Alister	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones.
310.1	GILL Greg & Liz	Rule 20	Oppose	We agree to some extent with plans needed for intensive winter grazing but not for normal farming.
312.1	GILLESPIE David	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social &

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				cultural viewpoints.
313.3	GILLESPIE Maria	Rule 20	Amend	That a definition is given for land used as a dairy young stock and support block and that it is incorporated into other rules relating to the use of land for sheep, deer or beef. That the use of land for dairy young stock and support is not to be considered dairy farming and fall under the dairy farming rules.
314.3	Gladvale Farms Ltd	Rule 20	Oppose	Amend rule 20(b) so the area is a percentage of your land. Amend Rule 20(i) – should be number of cows per hectare allowed on grazing properties.
316.2	Glenaffric Partnership	Rule 20	Oppose	We would like ES to consider taking water samples where water enters the property and where it exits the property to assess how well each property is looking after the environment.
318.1	Glenarlea Farms Ltd	Rule 20	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
319.11	Glendhu Dairies Ltd	Rule 20	Oppose	Delete.
320.1	Gleneden Dairies Ltd	Rule 20	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
323.1	Glenshe Trust	Rule 20	Oppose	Remove sheep farms from requiring a nutrient budget.
331.7	GRANT J J & J L	Rule 20	Oppose	ES provide a standard template for management plans and remove on request by providing specific timeframes for updates where there is a material change in practice.
334.2	Greenvale Station Ltd	Rule 20(f)	Amend	Grandfather rights need to apply.
336.2	GRIMM Hamish	Rule 20		A staggered farm management plan is necessary for all situations.
341.8	Gunton Farms Ltd (Jeremy Gunton)	Rule 20	Amend	Define what process will happen at '30 May 2019' e.g at 20 May 2019 Environment Southland will undergo further consultation and work to set out plans and policy changes!!
343.1	Halder Oreti	Rule 20	Oppose	In our opinion the 20 ha limit on agriculture activity re dairy winter grazing is absolutely stupid it should be based on a percentage of your land holding.
348.5	HAMILTON Blair	Rule 20	Amend	Amend 20 hectare trigger for a management plan to 100 hectares.
351.2	HAMILTON Rosemary	Rule 20	Oppose	It should only be a permitted activity for property owners of 1ha or less.
352.3	HAMMOND Emma & Peter	Rule 20		Clarification of contradiction between Rule 20(b) and Rule 23(a).
358.13	HASTIE Stephen	Rule 20	Oppose	A much more realistic time frame and councillors to be educated in farming practices before

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				any land and water plans are put in place. What were the farmers inputs during the collaboration of the water and land proposal, or was this made without direct farmers input?? Not just one farming practice but a variety of farming practices.
361.8	HBG AgriLimited	Rule 20	Support Amend	Amend Rule 20 to include substantially more detail around what the “Environment Southland Register of Independently Audited Self-Management Participants” would involve. This could be included in an Appendix.
362.3	Hedgehope Grazing Ltd	Rule 20	Amend	Phase in management plans for all land uses on a catchment by catchment or physiographic zone basis.
365.3	HEENAN M D and D W	Rule 20	Amend	Include an additional definition or reference within the rule to where replacement young stock or carry over cows fit.
368.1	HENDERSON Chris (Mrs)	Rule 20		In theory any farming activity on less than 20 hectares is less likely to have a significant environmental impact with the exception of intensive pig or poultry farming. It is assumed that the same requirements for a Management Plan will apply to these and any other intensive land uses on these holdings.  It is pleasing to note that farmers will write their own Management Plan to make ES requirements work for them. Support (b) – (k).
369.11	HENDERSON Michael	Rule 20	Oppose	Delete.
370.2	HENDERSON Stephen	Rule 20	Oppose	Make all farming a permitted activity.
371.4	HENDERSON Tracy	Rule 20	Oppose	Allow peat areas that are already being grazed and have waterways fenced off to dairy cows to continue winter grazing as a permitted activity.
381.18	HOLDER Wendy & Tom	Rule 20		Delete (b) through to (k).
386.8	Hopcroft Farms Ltd	Rule 20	Support in part Amend	Provide clarity on: <ul style="list-style-type: none"> <li>• How the Farm Plans are to be managed</li> <li>• The audit process.</li> <li>• Time period between audits</li> </ul> More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.
387.11	HORRELL Andrew	Rule 20	Amend	Replace ‘farming of sheep, deer or beef’ with other than dairy farming in Rule 20(e).
390.29	Horticulture NZ	Rule 20	Support in part	Retain Rule 20(a), (b), (c), (d), (f) and (g).
391.3	HOWE M A & B J	Rule 20	Oppose	Delete Management Plan requirements.

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392.1	HOWE Peter	Rule 20	Oppose	Replace requirement for farm environment plans with education.
394.2	HUDSON O F & S M	Rule 20	Oppose	Remove the need for farm management plans.
401.1	HUMPHRIES Trevor & Karen	Rule 20	Support	Retain Rules 20(b), (f) and (g)
402.9	HUNT Alistair & Bernadette	Rule 20	Amend	Amend the rule to remove reference to and restrictions based on physiographic zones.
407.1	HYLAND Maureen	Rule 20	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
411.30	Invercargill City Council	Rule 20(a)	Support	Retain rule 20(a).
413.1	Iron Bridge Farms Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
415.1	IRWIN Doug	Rule 20	Oppose	It is possible to farm with good environmental practice without having to submit a bureaucratic time consuming management plan.
420.2	JACK Wallace	Rule 20	Oppose	Delete.
424.1	JARVIS Ben	Rule 20	Oppose	No specific decision requested.
425.2	Jedburgh Station Ltd	Rule 20	Oppose	Extend timeframes to provide more flexibility.
428.1	Jones & Cooper Builders	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
429.2	JOYCE Nathan J & Julie L	Rule 20	Oppose	As an alternative I propose appropriate distinctions required that are reasonable and fair. Prior to the ES plan being confirmed and finalised; ES MUST visit EVERY farm in the ES catchment. A farm tour should be conducted ensuring each farm's unique attributes are being considered in the plan – not a blanket ban as what is being proposed. Water samples should be taken and discussion surrounding the positive and negative impacts the plan will have on both immediate and future farm viability, both economic and environmental.
433.4	Kapuka Dairies Ltd	Rule 20	Amend	I propose that this rule should be amended to 5 hectares or less.
434.2	Kauana Dairy Ltd & Taffy Ltd	Rule 20		Needs clarification. Amend activity status – discretionary versus restricted discretionary. Does this apply to all landowners?

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435.1	KAY Gilbert	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
437.19	KEMPTHORNE Robert	Rule 20	Oppose in part	Increase the time frames and <b>remove</b> the isolation of any one type of farming enterprise.
438.1	KENNEDY John	Rule 20	Oppose	<p>A management plan must be as simple as possible to enable it to be enacted easily. The more information in it the less it will be looked at however a plain management plan which has all of the <u>main</u> criteria for reducing harm to the receiving waterways will be the most effective with the main points that correspond to the physiographic zone included. Once a management plan has been enacted a full refund of the Dairy Differential Rate must be given for every year that a management plan is in place.</p> <p>I strenuously reject having to not only do a management plan in the physiographic zones but then also jump through further hoops to be able to farm where we currently are. Doing a management plan should be sufficient for me to carry on my business as before but under the guidance of the management plan.</p>
451.7	Knockinnon Farm Trust	Rule 20	Amend	Clarity on how farm plans are to be managed, the auditing process and time period between audits and amend date to, for example, 30 <sup>th</sup> May 2018.
461.2	LAMB Bruce & Gaye	Rule 20	Oppose	Amend 20ha cut off to 1ha or delete 20ha cut off.
463.1	LAMB Greg	Rule 20		Don't need a Management Plan to farm, remove.
464.14	Landpro Ltd	Rule 20	Oppose in part	We seek the inclusion that farming activities in the Alpine Zone are permitted.
469.2	LEGG Rob & Nessa	Rule 20	Oppose	There needs to be much more clear instructions and most importantly an easy to follow template if farmers are expected to be able to write this sort of Plan. It is extensive. Farmers should be able to fill in a template with their information in a user friendly way, again minimising time and avoiding unnecessary cost. As it stands there is no template available and most farmers would have to employ a consultant to write the plan on their behalf-this is unreasonable and pointless. If you want farmers to write a true plan then you have to provide them with the tool (template) to do so, someone else writing a plan for a farmer is an exercise and will not produce any environmental gain.
469.3	LEGG Rob & Nessa	Rule 20	Oppose	We should not need a consent to sheep, beef and deer farm, an activity that involves some intensive winter grazing!
474.1	LITTLE Robert Edsall	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural view points.
476.2	Lochhead Holdings Ltd	Rule 20		Amend to provide more clarification.
477.5	Longwood Properties Ltd	Rule 20(e)(i)	Amend	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.
478.18	LOVERIDGE David	Rule 20	Support Amend	Needs some clarity on audit process, period between audits.
482.11	Lower Aparima Catchment Group	Rule 20	Oppose	All references to areas or percentages of land holdings to be removed from the plan. The wintering of stock should be a permitted activity as long as the farm complies with their Farm Plan and GMP's.
482.12	Lower Aparima Catchment Group	Rule 20	Support in part Amend	Support concept but provide clarity on; <ul style="list-style-type: none"> <li>• how the Farm Plans are to be managed</li> <li>• the audit process</li> <li>• time period between audits</li> </ul> More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.
483.16	Ludell Ltd	Rule 20	Amend	Best practice for arable farming to be reflected in this plan to inhibit nutrient loss and overland sediment runoff. Environment South must consider the financial, economic and social repercussions to Southland.
491.1	MacGregor Motors (Balfour) Ltd	Rule 20	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
492.1	MACKAY Alexander	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
493.1	MACKENZIE Toni	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultural viewpoints.
496.1	MACPHERSON Chanelle	Rule 20	Oppose	No specific decision requested. Not enough time allowed, the 20/50 ha limits are not reasonable on our property, those capping limits are impractical.
501.1	Marlow Farms	Rule 20	Oppose	Have a management plan in place and apply for a change of consent if management plan changes.
502.2	MARSHALL Allan & Kathryn	Rule 20	Oppose	The 20 ha cut off is far too high and should be reduced to 1ha to ensure all lifestyle farmers are also included or delete and leave as voluntary requirements. Continued education and collaboration with the land sustainability team on a farm by farm basis, will deliver effective results tailored to individual farms. This will both enhance these farms and improve the environment without the need for blanket rules and expensive plans.
503.1	MARSHALL Logan	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
505.1	MARSHALL Norman	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.2	MARSHALL R C	Rule 20	Oppose	Push out all dates to 2025.
507.2	MARSHALL Spencer	Rule 20	Oppose	The 20ha cut off is far too high and should be reduced to 1ha to ensure all lifestyle farmers are also included. Ore delete altogether and leave as voluntary requirements to access funding for environmentally friendly projects. Physiographic zones are confusing and in the case of our farm incorrect and not fit to be used as a regulatory tool. Continued education and collaboration with the land sustainability team on a farm by farm basis, will deliver effective results tailored to individual farmers. This will both enhance these farms and improve the environment without the need for blanket rules and expensive plans.
510.1	Mataura Butcher Shop Ltd	Rule 20	Oppose	Make permitted.
515.5	MCCROSTIE Ray	Rule 20(a) & (e)	Amend	Amend the rule 20(a) to: “The use of land for a farming activity on a landholding that is less than 4 ha is a permitted activity.” Amend the rule 20 (e) to: "Despite any other rule, from 30 May 2018 the use of land for the farming of sheep, deer or

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				beef on a landholding that is between <u>4 hectares</u> and 100 hectares in area is a permitted activity, provided the following condition is met: (i) a Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.
517.2	MCDONALD Colin & Dot	Rule 20	Support Oppose	Retain, but we would like to see farmers on the councils, and practical training for council staff. I think there should be some transparency in the end direction of these plans, farmers after all, are generally keen to keep their land healthy and productive, contrary to popular belief, we are not there to rape and pillage it!
519.4	MCDONALD W F & K M	Rule 20	Oppose	Continue with the “good practice” model used in the past for whole community.
520.2	MCELLIGOTT J W & T L	Rule 20	Oppose Amend	Produce a lead in time/grace period for dairy.
521.2	MCEWAN Trevor & Anthea	Rule 20	Oppose	As an alternative I propose – push out the timeframes.
522.3	McFarm Trust - Pahia	Rule 20	Oppose	Identify situations where activities can have adverse effects and manage these effects through good management practices on their farm. Use of Farm Environment Plans Catchment group participation.
525.1	MCINTYRE Hayden	Rule 20	Oppose	Only require a 10 year plan unless the farmer has a bad track record.
527.1	MCKAIN Belinda	Rule 20	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
537.3	MCKENZIE G & T Partnership	Rule 20	Oppose	Delete Management Plan requirements.
538.3	MCKENZIE Hayden	Rule 20	Oppose Amend	Dates are pushed out until after Southland District Council or Environment Southland have worked through the rule changes with farmers in a bit more depth.
539.1	MCKENZIE Matthew	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and

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				cultural viewpoints.
542.2	MCLEAN David	Rule 20	Oppose	Re-evaluate the system proposed in relation to physiographic zones.
548.1	MCMULLEN Leith	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
553.7	McPhelzo Trust (C G & M P Pullar)	Rule 20	Oppose	Properties are defined by their largest physiographic zone. Dates are pushed out to 2020, 2022, and 2025 respectively.
554.8	McPhelzo Trust (Z, E & P Pullar)	Rule 20	Oppose	Properties are defined by their largest physiographic zone. Dates are pushed out to 2020, 2022, and 2025 respectively.
555.12	MCRAE Daryl & Ruth	Rule 20	Support in part	As an alternative we propose: Stagger the introduction of the plan not just on a physiographic basis, but also on a stock class/intensity basis. Introduce effects based parameters to allow for more diversity in stocking rates and management systems.
556.4	MCRAE Joe	Rule 20	Oppose	If the minority are targeted, the worst offenders, a better result would be achieved. I see education of the farmer more important, especially the bottom 10%. The frequency of the management plan could also be pushed out for a longer period, perhaps 5 years.
557.3	MCRAE Matt	Rule 20	Oppose	As an alternative I propose to use the physiographic zones as a tool for education but not for enforcement until you can prove the accuracy behind it.
558.8	MCRAE Natalie	Rule 20	Oppose	Amend to state al existing farming as at 1 May 2016 is a permitted activity.
559.1	MCRAE Neroli	Rule 20	Oppose	Ensure that any science used is accurate.
560.4	MCRAE Tim & Justine	Rule 20	Oppose	Updated soil maps will give a better understanding of soil types and then future management of these
563.1	MEYER Timothy	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social & cultural viewpoints.
565.2	MIDDLETON Lindsay	Rule 20(c)(g)	Amend	Rule 20 needs to be re-written to reference intensive winter grazing pre 30 May 2019 and post 30 May 2019 to a permitted activity as long as conditions from Rule 23 and 25 are met as well as the Management Plan required post 30 May 2019. Delete Rule 20(e) or at least change it to include the same rules for intensive winter grazing and nutrient budgeting as the other parts of Rule 20.

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568.1	MILLER N & L J Family Trust	Rule 20	Oppose Amend	The format should be a simple 'tick the boxes' type form which can be filled in easily in the home office without the need for engaging an expensive consultant.
570.14	MILLER R L & S J Farm Trust	Rule 20	Support in part	Delete all land use restrictions by physiographic zone. Simplify the system. Permitted activity but Management Plan and/or Nutrient Plan provided. ES needs to be not only aware of the costs associated with this plan, but have an actual budget that it can show to the ratepayers. The Rule needs to recognise and support the value of social and cultural aspects in the rural community. Delete all references to the ES register of Independently Audited Self-Management Participants.  Introduce an urban rule governing the adverse effects they have on water quality.
571.1	MILLER Susan	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
572.2	Ministry for Primary Industries	Rule 20	Amend	Retain the provision for implementation of any Independently Audited Self-Management (IASM) schemes developed in the future, along with some amendments to provide additional clarity and certainty. Including (i) what the requirements are for IASM scheme participants in order to be listed on the IASM Register (including that they may require a farm environmental management plan) and (ii) the requirements of IASM scheme providers in order to obtain Environment Southland's approval of either the scheme or the scheme provider.
574.2	MITCHELL G B & M D	Rule 20	Amend	Rule changed to 50ha on 15% land area.
576.3	MOIR Joseph	Rule 20	Oppose	Delete.
578.1	Moonlight Trust	Rule 20	Oppose	Delete Management Plan requirements.
580.2	MORRIS G G & R M Family Trust	Rule 20(e)	Amend	Farm management plans only to be required when a significant change in farming practice occurs. Need breakdown of costs if ES impose a charge for auditing of plans.
581.2	MORRIS Lenore	Rule 20 (e)(f)(i)(j)	Oppose	Farmers should not have to provide a management plan if they have a proven record as a responsible farmer. All activities should be permitted other than any more dairy farming unless land is vulnerable.
582.2	MORRIS Peter & Norina	Rule 20	Oppose	There should not be a size limit to how much can be farmed. All activities should be permitted other than any more dairy farming unless land is vulnerable. Farmers should not have to provide a management plan if they are a responsible farmer.
583.19	MOSEBY Ryan	Rule 20	Support	Retain.

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586.6	MOUAT Family Trust	Rule 20	Support	Retain.
590.8	Mt Linton Station	Rule 20	Oppose	Replace Rules 20(b) and 20 (k) with more gradual change in wintering practice, with a farm plan in the meantime to show how risks can be mitigated.
595.1	MURRAY Rex	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
597.2	NAPPER Mary & FINDLAY Allan	Rule 20	Amend	Increase the size of landholding for which farming is a permitted activity to 25 hectares.
598.1	Newton Slink Skins	Rule 20	Oppose	Make permitted.
599.1	NEWTON T W & L M	Rule 20	Oppose	Delete.
603.3	Nithdale Station	Rule 20	Support	Retain.
604.3	Nokomai Station Ltd	Rule 20	Oppose in part	Inclusion of the Alpine Zone within the Rule as a permitted farming activity so that our existing activities can be recognised.
606.2	Norham Farm Ltd	Rule 20	Oppose	<p>Farmers who do not intensive winter graze dairy cattle, beef cattle or deer. Farmers who are putting in less than 10% of their farm in winter feed crops should not be required to complete a 'Management Plan'. This requirement will create an industry of 'specialists' who will create a sizable cost for some simple farming systems which will not create any change in there already very simple and sustainable farming system.</p> <p>Any requirement for a 'Management Plan' should be able to be completed on a template supplied by Environment Southland/Southland Regional Council to ensure that all can complete this at home following a step by step guide. This is to prevent a full fledge industry being required to complete these plans for farmers and adding another compliance cost to farming businesses.</p>
609.3	NZ Deer Farmers Association – Southland Branch (Richard Cook)	Rule 20		<p>Rule 20 – Farming</p> <p>(a) The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.</p> <p>(b) Until <del>30 May 2018</del> <u>ten years of the plan becoming operational</u>, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, <u>Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, Old Mataura or Lignite-Marine Terraces Physiographic Zones</u>, other than dairy farming of cows or intensive winter grazing,</p>

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				<p>is a permitted activity.</p> <p><del>(e) Until 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity.</del></p> <p><del>(d) Until 30 May 2020, the use of land for a farming activity in the Old Maitaura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity.</del></p> <p><del>(e)</del> (c) Despite any other rule, from <del>30 May 2018</del> <u>ten years of the plan becoming operational</u>, the use of land for the farming of sheep, deer or beef on a landholding that is between 20 hectares and 100 hectares in area is a permitted activity, provided the following condition is met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</p> <p><del>(f)</del> (d) From <del>30 May 2018</del> <u>ten years of the plan becoming operational</u>, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, <u>Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, Old Maitaura or Lignite-Marine Terraces Physiographic Zones</u>, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</p> <p><del>(g) From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>Participants:</del></p> <p><del>(h) From 30 May 2020, the use of land for a farming activity in the Old Mataura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, is a permitted activity, provided the following condition is met:</del></p> <p><del>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>(i) From 30 May 2018 ten years of the plan becoming operational, the use of land for a farming activity in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, Old Mataura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(e) or Rule 20(f) is a discretionary activity.</del></p> <p><del>(j) From 30 May 2019, the use of land for a farming activity in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(g) is a discretionary activity.</del></p> <p><del>(k) From 30 May, the use of land for a farming activity in the Old Mataura or Lignite-Marine Terraces Physiographic Zones, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20(h) is a discretionary activity.</del></p> <p>Clarify for Rule 20: i) How the council and industry will be able to resource the provision of Management Plans for all sheep, deer and beef farms by 30 May 2020 and, ii) how the council will be able to resource the processing and compliance of resource consents for farming as a discretionary activity from 1 June 2018 onwards.</p>
613.2	NZ Groundspread Fertilisers Association Inc.	Rule 20		Amend to clarify who this rule applies to and clarify the appropriate activity status i.e. discretionary or restricted discretionary.
615.2	O'CONNELL Dennis	Rule 20	Oppose	No specific decision requested.
616.6	O'CONNELL Elizabeth	Rule 20	Oppose	That there is a gradual introduction of the rules by way of a farm visit for each landholding from an ES officer, followed by an 'education' visit for the first infringement, after which subsequent non-compliance may be enforced if offending can be shown to be deliberate and unavoidable. Consents for specific activities may require a written report.

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617.2	O'NEIL Craig & Colleen	Rule 20	Amend	It should be a percentage of the landholdings not 50 ha's.
618.1	Onepu Farms Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
623.1	P H Bennett Ltd	Rule 20	Oppose	Amend this rule because you are requiring all farmers to produce a new Management plan every year. This is unrealistic. Once we have a management plan and your farming practices are not changing each year then the original plan should suffice other than the odd amendment each year. Producing a new plan each year is costly and time consuming.
630.1	PATTULLO Pauline	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
632.1	Peat View Dairies Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
635.1	PGG Wrightsons	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
638.1	Pinnacle Farming Company Ltd	Rule 20	Amend	The timing for completion of Farm Management Plans to be extended to 31 December 2016, Farm Management Plans to allow for flexibility throughout the farming year, and to recognise that change and flexibility in systems is a natural part of farming.
639.1	PITCHER Brian	Rule 20	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
640.35	Pourakino Catchment Group	Rule 20	Support	Retain.
642.3	PREBBLE Lynden	Rule 20	Oppose Amend	As an alternative I propose a full economic assessment should be completed and published before these rules are implemented so a balanced result can be obtained.
643.3	PREBBLE Sandra	Rule 20	Oppose Amend	As an alternative I propose a full economic assessment should be completed and published before these rules are implemented so a balanced result can be obtained.



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645.2	PRICE William	Rule 20	Oppose	Push out all dates to 2025.
646.2	Progress Valley Farms Ltd	Rule 20	Oppose	Continued education and collaboration with the land sustainability team on a farm by farm basis, will deliver effective results tailored to individual farmers. This will both enhance these farms and improve the environment without the need for blanket rules and expensive plans.
648.1	Puke Rua Dairies Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
649.1	Puke Tahī Dairies Ltd	Rule 20	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
652.4	PULLAR Mary	Rule 20	Oppose	As an alternative we propose: <ul style="list-style-type: none"> <li>• That properties are defined by their largest physiographic zone,</li> <li>• That the dates are pushed out to 2020, 2022, and 2025, respectively.</li> </ul>
655.6	RABBIDGE Dean	Rule 20(e)(i)(f)	Amend	At what cost will be production of a farm management plan? Will this be an annual cost to review? If three properties are run as one financial entity will they all be covered by one plan or are three required? Is it necessary to complete a nutrient budget on Overseer when it is regarded as totally inaccurate and fundamentally flawed in the agriculture community? Clarify: “Intensive winter grazing”, in particular for sheep.
656.3	RABBIDGE Stephen	Rule 20	Amend	Enforce a requirement of a Management Plan on non-compliant farmers only. Change all dates restricting the farming of dairy cows and intensive grazing on particular land zones. Does (e) mean that farming more than 100 ha becomes a non-permitted activity? If so, the threshold needs to include land holdings of any size.
661.37	Ravensdown Ltd	Rule 20	Support in part	While Ravensdown supports the overall intent of Rule 20, and seeks the permitted activity status for farming activities on a landholding <20ha to be retained, it seeks Rule 20 to be deleted and replaced with the following new rule structure to read (or similar):  <b><u>New Rule 20A</u></b> <u>The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.</u>

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				<p><b><u>Rule 20B</u></b></p> <p><u>The use of land for a farming activity, other than dairy farming of cows or intensive winter grazing, is a permitted activity:</u></p> <ul style="list-style-type: none"> <li><u>i) Until 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones</u></li> <li><u>ii) Until 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones</u></li> <li><u>iii) Until 30 May 2020 in the Old Maitava or Lignite-Marine Terraces Physiographic Zones</u></li> </ul> <p><b><u>Rule 20C</u></b></p> <p><u>From:</u></p> <ul style="list-style-type: none"> <li><u>a) 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, or</u></li> <li><u>b) 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, or:</u></li> <li><u>c) 30 May 2020 in the Old Maitava or Lignite-Marine Terraces Physiographic Zones:</u></li> </ul> <p><u>the use of land for a farming activity, other than dairy farming of cows or intensive winter grazing,</u></p> <p><u>is a permitted activity, provided the following condition is met:</u></p> <ul style="list-style-type: none"> <li><u>(i) a Farm Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to the Southland Regional Council upon request, or the farming activity and the property on which the activity is undertaken is subject to an Independently Audited Self- Management scheme approved by the CEO of the Southland Regional Council.</u></li> </ul> <p><b><u>Rule 20D</u></b></p> <p><u>From:</u></p> <ul style="list-style-type: none"> <li><u>a) 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, or</u></li> <li><u>b) 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, or:</u></li> <li><u>c) 30 May 2020 in the Old Maitava or Lignite-Marine Terraces Physiographic Zones:</u></li> </ul> <p><u>The use of land for a farming activity, other than dairy farming of cows or intensive winter</u></p>

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				<p><u>grazing, that does not comply with the condition of Rule 20C or Rule 20E is a restricted discretionary activity.</u></p> <p><u>The Southland Regional Council will restrict the exercise of its discretion to the following matters:</u></p> <p>1. <u>Content of the Farm Management Plan.</u></p> <p><u>The potential benefits of the activity to the community and the environment.</u></p> <p><b><u>Rule 20E</u></b></p> <p><u>Despite any other rule contained in this Plan, from 30 May 2018 the use of land for the farming of sheep, deer or beef on a landholding that is between 20 hectares and 100 hectares in area is a permitted activity, provided the following condition is met:</u></p> <p><u>(i) a Farm Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to the Southland Regional Council upon request, or the farming activity and the property on which the activity is undertaken is subject to an Independently Audited Self- Management scheme approved by the CEO of the Southland Regional Council.</u></p>
666.13	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 20	Oppose	Rule 20, 21 and 22 should all be defined the same, they should all be permitted, or they should all be discretionary.
669.1	ROBB Alfred	Rule 20	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
670.3	ROBB Tony & Jill Family Trust	Rule 20	Oppose	Don't let there be any new changes made. No new dairy farms. Continue close monitoring of the established dairy farms for compliance.
677.1	Robinson Dairies Ltd	Rule 20	Amend	Amend so zone not categorised by poorest land type.
678.3	ROBINSON Jeffrey	Rule 20	Support	Retain.
679.3	ROBINSON Michael	Rule 20	Support	Retain.
681.11	Rockytommy Farming Ltd	Rule 20	Oppose in part	We request that council provide justification for their estimated consenting cost as outlined in the Section 32 report. We seek that council amend the rule to request copies of Management Plans within a set timeframe i.e. between May – August each year. We also seek security from Environment Southland of the privacy of information within a Management Plan.
682.7	Rokenwai Farming Ltd	Rule 20	Oppose in part	We request that council provide justification for their estimated consenting cost as outlined in the Section 32 report. We seek that council amend the rule to request copies of Management

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				Plans within a set timeframe i.e. between May – August each year. We also seek security from Environment Southland of the privacy of information within a Management Plan.
689.2	ROSS Keith	Rule 20	Oppose	Push out all dates to 2025.
690.3	ROSS Warren	Rule 20	Oppose	Less regulation upon the farmer and a more co-ordinated and co-operative approach between the farmer and Council. This proposed plan seems to be very “farmer heavy” with little responsibility on the Council. Council appear to be taking a dictator type approach and have not considered the plan in any significant depth from the industry point of view. The environmental aspects need to be considered and balanced against the economic ramifications (not only from the farmer but the nation in its entirety).
691.3	Rossland Farming Ltd	Rule 20	Oppose	Less regulation upon the farmer and a more co-ordinated and co-operative approach between the farmer and Council. This proposed plan seems to be very “farmer heavy” with little responsibility on the Council. Council appear to be taking a dictator type approach and have not considered the plan in any significant depth from the industry point of view. The environmental aspects need to be considered and balanced against the economic ramifications (not only from the farmer but the nation in its entirety).
692.2	ROWE Emma	Rule 20	Oppose	Clarify who are the Independently Audited Self-Management Participants and what qualifications/knowledge do they have around Overseer and farm systems? What are the Best management practices? These can be subject to interpretation, and will they change as new technology develops. What is considered a landholding? If you have two farms not adjoining run by the same person is this counted as one or two landholdings?
693.3	ROY Bevan	Rule 20	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
694.2	ROY Bruce	Rule 20	Oppose	That properties are defined by their largest physiographic zone. That the dates are pushed out to 2020, 2022 and 2025 respectively.
695.2	ROY James	Rule 20	Oppose	As an alternative I propose: <ul style="list-style-type: none"> <li>• That properties are defined by their largest physiographic zone.</li> <li>• That the dates are pushed out to 2020, 2022 and 2025, respectively.</li> </ul>
699.1	Rural Livestock Ltd	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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700.2	Rural Solutions Ltd	Rule 20		How this rule applies to farms with multiple physiographic zones needs to be clearly defined. I am hoping what you mean is that each zone is governed by the relevant rules and not that the predominant zones takes precedence.
709.2	SCHMIDT D	Rule 20	Oppose	Amend 20(iii) up to 60 ha or 25% of farm.
711.6	SCOTT G D & M M	Rule 20	Support	Retain.
712.27	Seaview Trust & Oraka Farms Ltd	Rule 20	Support	Retain provided Physiographic Zones are removed as in previous submission point.
714.1	SELLWOOD Luke	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
716.2	SHALLARD Mark & Tania	Rule 20	Oppose Amend	The dates are pushed out to 2020, 2022 and 2025.
721.2	SHEARING Dean	Rule 20(e)	Amend	Change wording from “between 20 hectares to 100 hectares” to “landholding of any area.”
722.1	SHEARING Gordon	Rule 20	Support	Retain.
723.2	SHEARING Raymond	Rule 20(e)	Amend	Change wording from “between 20 hectares to 100 hectares” to ‘landholding of any area’.
723a.2	SHEARING Euan & Lisa	Rule 20(e)	Amend	Change wording from “between 20 hectares to 100 hectares” to ‘landholding of any area’.
726.4	Slattery Trust	Rule 20	Oppose	We would like to know the cost for consents required and the management plan.
728.3	Slope Point Farms Ltd	Rule 20	Amend	Go from farmer to farmer and take the time needed to get it right so that there is no more costs involved applying for consents that should have been sorted from the start. Be reasonable with timeframes.
730.2	SMALLEY Timothy	Rule 20	Oppose	We oppose this due to not enough professional help trained or available to help draw up plans required.
733.14	SMITH Hamish & Karen	Rule 20	Support	We ask that the Council does not make this into a large compliance cost. We ask you to keep the auditing of plans to a minimum, i.e. only when required for consents, as a random check, or if there is a specific problem, rather than routine regular auditing which will create unnecessary cost to farmers through fees and rates.
734.1	SMITH Warren	Rule 20	Oppose	Delete.
737.18	Smithill Ltd	Rule 20	Amend	We support the overall principle of management plans. However, we believe clarification needs

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				to be given on; how Farm Plans are to be managed, the audit process and periods between audits. There should be more information regarding, Environment Southland Register of Independently Audited Self-Management Participants and should be included in the plan.
739.1	SOMERVILLE John	Rule 20	Amend	Needs more realistic time frames for farmers and for increasing advisory capability. If Environment Southland are serious about having all dry stock farmers complete their management plans on time they will have to resource it adequately through their land sustainably service. Clarify what happens to farms that have two or more physiographic zones in their property? The rule does not expand on the ES register of independently audited self-management participant's works. So further detail on this would be needed.
743.3	Southern Farms NZ Ltd (Brendon Phillips)	Rule 20	Oppose	No definition of winter grazing given in relation to stock class/stocking rate not being able to expand the dairy farm will reduce my property value.
747.5	Southern Star Farms Ltd	Rule 20	Amend	Amend the rule 20(a) to: "The use of land for a farming activity on a landholding that is less than 4 ha is a permitted activity" Amend the rule 20 (e) to: "Despite any other rule, from 30 May 2018 the use of land for the farming of sheep, deer or beef on a landholding that is between <u>4 hectares</u> and 100 hectares in area is a permitted activity, provided the following condition is met: (i) a Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.
748.3	Southern View Ltd	Rule 20		Amend so that dairy farming is a permitted activity if a Farm Environmental plan is completed in the time frames allowed by Council.
752.112	Southland Fish & Game Council	Rule 20	Support Amend	Amend Rule 20 to provide: "(a) The use of land for farming activity, <i>excluding intensive horticulture</i> , on a landholding that is less than 20 hectares is a permitted activity." And Amend Rule 20 to provide that intensive horticulture is a permitted activity provided a

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				<p>management plan is prepared and implemented in accordance with Appendix N of the pWLP, which includes mitigations relevant to the activity and relevant physiographic zone, or the activity and property on which it is situated is listed on the Environment Southland Register of Independently Audited Self-Management Participants. Include a time frame for compliance.</p> <p>And</p> <p>Amend all references to the Peat Wetlands physiographic unit in Rule 20 and other Rules in the pWLP to make it clear that it excludes natural wetlands as follows:</p> <p>“ . . . Peat wetlands (<u>excluding natural wetlands</u>) . . . ”</p>
757.5	Southwest Properties Ltd	Rule 20	Amend	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.
759.9	Springlands Group Ltd	Rule 20	Oppose in part	We request that council provide justification for their estimated consenting cost as outlined in the Section 32 report. We seek that council amend the rule to request copies of Management Plans within a set timeframe i.e. between May – August each year. We also seek security from ES of the privacy of information within a Management Plan.
762.4	STANLEY Karen	Rule 20	Support	Critical source areas to be managed as farm environmental management plan.
766.4	STEVENS Brendon	Rule 20	Oppose in part	Amend the rule to request copies of the Management Plans within a set time frame i.e. between June-August each year and clarify that the plans are confidential between farmers and ES to ensure privacy.
767.5	STEVENS David	Rule 20		<p>Environment Southland will have to resource completion of management plans adequately through their land sustainability service. This would require staff availability for hosting workshops and helping individual farmers plus user friendly online and hard copy information to aid in putting a plan together. Has the cost of this been budgeted for by the council and is the number of farms involved in each deadline date known?</p> <p>What happens to farms that have two or more physiographic zones in their property?</p> <p>Need more information on the Environment Southland register of independently audited self-management participant’s work</p> <p>If a farmer has not completed a management plan by the zone deadline, will a consent be required?</p> <p>What plans do the council have to increase the number of certified nutrient budget specialists?</p> <p>Strongly disagree with the proposed dates (Rule 20-b, c, d, e, f, g, h, i, j, k) that farmers are required to apply and implement a Management Plan (including mitigations relevant to the</p>

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				farming type).
768.9	STEVENSON Audrey	Rule 20	Oppose in part	Be fair – remove the isolation of any one type of farming enterprise. Increase time frames.
771.11	STEWART Family Trust (Trevor Stewart)	Rule 20	Amend	Make the farm plan as simple as possible for me to complete.
774.4	STEWART Vanessa	Rule 20	Amend	Farm Management plans should only be required on dairy farms and farms running more than 15su/ha.
775.2	Stoney Creek Station Ltd	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
776.1	STRANG Matthew	Rule 20	Oppose	We realise that the farming sector is partially responsible for water quality but doubt all faecal contamination in the waterways comes from farming and would like to see the stats on contaminants from ducks and seagulls and residential effluent. What has Environment Southland imposed on the Cities to help clean up their contamination on water quality?
780.2	Strathfair Farms	Rule 20	Support	Provide Management Plans that are easy to do and have what Environment Southland would like and what farmers can achieve.
782.1	STRINGER Gay	Rule 20	Oppose	I disagree with farming becoming a permitted activity, but I do think it is reasonable for you to put in place stocking rate suggestions so that sensitive lands aren't damaged with over stocking.
783.2	STRINGER Joe	Rule 20	Neutral	Define intensive winter grazing? Is this animal's per acre/hectare/metre/cubic metre??? What's an acceptable rate? What empirical evidence do you have to support this? What is the stocking rate of ducks in the Invercargill gardens ponds and what is the faecal runoff...?  In relation to 20(i) Does this mean that any farm over 100ha could have his farming practice shut down/halted/reduced? Who reimburses for lost funds income or social ramifications (farmer depression suicide?). Will ES, local government/national government reimburse farms for lost income? Will we move to a farming practice like the UK where we are paid to keep land out of production? Discretionary activity – Set by whom? ES? What is the appeal process? What is the monitoring process? How transparent is this?
786.4	SUTHERLAND Kevin & Ann	Rule 20	Oppose	Amend the dates to 2020, 2022 and 2025 respectively.
787.3	SUTHERLAND Richard	Rule 20	Neutral	Improve clarity for properties with more than one zone.
788.1	Switzer's Valley Transport	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.



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790.6	TAIT G R & J E & Waikawa Valley Trust	Rule 20	Oppose	Costly and time consuming. (a) This limit of 20ha should be removed. (e) Mentions area of between 20 and 100ha – clarify what happens to anything over 100ha.
791.1	TALBOT Jeanette	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
792.23	TAYLER Matthew	Rule 20	Oppose	I propose 2020, 2022 and 2025 timeframes respectively.
793.3	TAYLER Phillip	Rule 20	Amend	Create an equivalent rule for forestry or reduce the focus on farming.
796.1	TAYLOR Marcy	Rule 20	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
797.37	Nga Runanga and TRONT	Rule 20	Oppose in part	Ensure that where a hectare limit trigger is used within a permitted activity rule in rules 20-23 the limit set is reflective of the attributes of the Physiographic Zone. Retain rule as worded with the exception of the following amendment to 20(a): The use of land for a farming activity <u>other than intensive winter grazing</u> on a landholding that is less than 20 hectares is a permitted activity
798.5	TEMPLETON Luke	Rule 20	Support in part Amend	Retain but Provide clarity on; <ul style="list-style-type: none"> <li>• how the Farm Plans are to be managed?</li> <li>• the audit process</li> <li>• time period between audits</li> </ul> More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.
799.6	TEMPLETON Peter	Rule 20	Support in part Amend	Provide clarity on; <ul style="list-style-type: none"> <li>• how the Farm Plans are to be managed?</li> <li>• the audit process</li> <li>• time period between audits</li> </ul> More detail is required around the "Environment Southland Register of Independently Audited Self-Management Participants" and needs to be included in the Plan.
800.2	TEMPLETON Vaughan	Rule 20	Support	Support the general concept of farm plans where farming practice are demonstrably higher risk.

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				There is little value in having a farm plan if the farming system has little risk.
802.23	The 254 Partnership & Gerken Family Trust	Rule 20	Oppose	Winter grazing should be a permitted activity with GMP. Remove Physiographic Zones and Farm Management Plans from the plan. If not fully removed FMP should be for a 5 year period, exclude the requirement to use Overseer and only be required by those farmers requiring resource consent.
803.38	The Fertiliser Association of NZ	Rule 20	Support in part Amend	<p>Delete Rule 20 and replace with the following:</p> <p><u>Rule 20 A</u>  <u>The use of land for a farming activity on a landholding that is less than 20 hectares is a permitted activity.</u></p> <p><u>Rule 20B</u>  <u>The use of land for a farming activity, other than dairy farming of cows or intensive winter grazing, is a permitted activity;</u></p> <p>i) <u>Until 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones.</u>  ii) <u>Until 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones.</u>  iii) <u>Until 30 May 2020 in the Old Maitaura or Lignite-Marine Terraces Physiographic Zones.</u></p> <p><u>Rule 20C</u>  <u>The use of land for a farming activity, other than dairy farming of cows or intensive winter grazing, is a permitted activity</u></p> <p>i) <u>From 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones;</u>  ii) <u>From 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones;</u>  iii) <u>From 30 May 2020 in the Old Maitaura or Lignite-Marine Terraces Physiographic Zones;</u></p> <p><u>provided the following condition is met:</u></p> <p>(a) <u>a Farm Management Plan is prepared and implemented in accordance with Appendix N, including mitigations relevant to the farming type being undertaken and relevant</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>physiographic zone, and provided to Environment Southland upon request, or</u></p> <p>(b) <u>the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p> <p><u>Rule 20D</u>  <u>The use of land for a farming activity, other than dairy farming of cows or intensive winter grazing, that does not comply with the condition of Rule 20C or Rule 20E</u></p> <p>i) <u>From 30 May 2018 in the Oxidising, Riverine or Peat Wetlands Physiographic Zones, and;</u>  ii) <u>From 30 May 2019 in the Central Plains, Bedrock/Hill Country or Gleyed Physiographic Zones, and;</u>  iii) <u>From 30 May 2020, the use of land for a farming activity in the Old Maitava or Lignite-Marine Terraces Physiographic Zones:</u></p> <p><u>is a restricted discretionary activity.</u></p> <p><u>Environment Southland will restrict the exercise of its discretion to the following matters:</u></p> <ol style="list-style-type: none"> <li><u>1. whether the activity will avoid, remedy or mitigate potential adverse effects on water quality and soils.</u></li> <li><u>2. monitoring and reporting;</u></li> <li><u>3. the proposed management practices to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</u></li> <li><u>4. the potential benefits of the activity to the community and the environment.</u></li> <li><u>5. the preparation and implementation of a Farm Management Plan.</u></li> </ol> <p><u>Rule 20 - E</u></p> <p>i) <u>Despite any other rule, from 30 May 2018 the use of land for the farming of sheep, deer or beef on a landholding that is between 20 hectares and 100 hectares in area is a permitted activity, provided the following condition is met:</u></p> <p>(a) <u>a Farm Management Plan is prepared and implemented in accordance with Appendix N, but</u></p>

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				<u>excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u>
807.2	The Terraces Ltd	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
808.3	THOMAS Alison & Roger	Rule 20	Amend	Land management plans to cover initiatives to manage methods of farming. Land management individualised rather than rules that limit activity. Farmers using initiative to protect environment. Should be different for sheep as sheep have different impacts on environment. Increased costs a real concern, don't charge for land management plan reviews.
810.33	Three Rivers Catchment Group (TRCG)	Rule 20	Support	Retain.
812.1	TIDEY Allan	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
813.5	Tihaka Farms	Rule 20(e)(i)	Amend	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.
816.4	TIPPETT Christie	Rule 20	Support	Retain.
817.20	Tomogalak Gorge Trust (Jeffery Keen)	Rule 20	Support	Retain
818.21	Tomogalak Gorge Trust (John Keen)	Rule 20	Support	Retain.
819.19	Tomogalak Gorge Trust (Linzi Keen)	Rule 20	Support	Retain.
820.7	TOPHAM Jeanette	Rule 20		Dairy farming and all stock classes are recognised as needing to mitigate their nutrient losses. Change the clauses with 'other than dairy farming of cows or intensive wintering' to read 'farming all classes of stock using Good Management Practices and Farm Plans, whether on forage crops or grass wintering, is a permitted activity.'

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821.2	TOSH David	Rule 20	Oppose	No specific decision requested.
824.2	Tulloch Farm Glendhu Ltd	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
825.2	Tulloch McNab Transport Ltd	Rule 20	Oppose	Align the dates with the NPS-FM and push out all dates to 2025.
832.81	VAN GOOL Raewyn	Rule 20	Amend	Rule 20(a) amend 'that is less than 20ha is a permitted activity <u>except intensive use of land &lt;220ha</u> '. <u>Retain 20(b), (c) and (d)</u> <u>Delete 20(e)</u> <u>Amend 20(f), (g), (h), (i), (j), (k) to match up with the FMU Catchment Limit Setting process.</u>
834.3	VAN ROSSUM Winy & Maarten	Rule 20	Oppose	We would like to recommend that field days and/or workshops are held, as an alternative to requiring farm management plans, to educate farmers on good management practices.
835.1	VAN ZYL Hendrik	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.1	VAN ZYL Michelle	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
840.6	W & B Clarke & Son Ltd	Rule 20(e-h)		We believe Environment Southland should focus on education and culture change to generate improvement in good management practices rather than requiring a document to be submitted saying that a farmer will do something.  We suggest that Environment Southlands Land Sustainability resource be invested in and increased to allow the Land Sustainability team to interact with farmers in a manner that is non regulatory rather than have rules requiring annual farm management plans; that then may not be followed on farm and require extensive monitoring by Environment Southland to ensure compliance.  If the submission of these plans is to remain within the Plan at the very least we would like to suggest that these plans be done on at most a bi-annual basis and preferably Tri-annually, and that there is a mechanism for changes to be easily made if required or due to unforeseen

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				circumstances that may arise over this time frame.
842.5	Waihoaka Holdings Ltd	Rule 20(e)(i)	Amend	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.
843.4	Waikaia Plains Ltd	Rule 20	Oppose Amend	This would be more acceptable as a percentage of farmed land. 20(b) not clear as to the intent of intensive winter grazing i.e. does it also apply to Mob Stocking of sheep on grass or is it intended for all stock types on cultivated crops only or is it relating to dairy and/or beef?
851.2	WEIR Darren	Rule 20	Oppose	No specific decision requested.
852.3	WEIR Pauline & Andrew	Rule 20	Oppose	No specific decision requested.
853.2	WEIR Victoria	Rule 20	Oppose	Delete.
854.2	WELLER Grant & Bernie	Rule 20	Support	I support this policy for permitted activities but wish to remove the need for a full management plan for Bedrock Hill and high country. Instead extensive operations/sheep and beef farmers keep all relevant materials needed for a nutrient budget and if systems change or ES recommends a budget, can be readily available.
861.19	WHITE John Copeland	Rule 20	Support in part Amend	Provide clarity on; <ul style="list-style-type: none"> <li>• how the Farm Plans are to be managed</li> <li>• the audit process</li> <li>• time period between audits</li> </ul> More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.
864.5	Whyte Partnership	Rule 20	Oppose	Require farm management plans for everyone even if they own less than 20ha or not at all and make the required plan simpler.
865.4	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 20	Amend	Clarification around what will happen to Bedrock/Hill Country zone after 30 <sup>th</sup> May 2019.
866.2	WILKINS Brendan	Rule 20	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
867.1	WILKINS Donna	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both

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				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
868.16	Wilkins Farming Ltd	Rule 20	Oppose in part	<p>Any regulation needs to be delayed until necessary due diligence is achieved from scientific, economic and social perspectives. Something like but not limited to the Southland Economics Project this may take 5-10 years then so be it. Regulation should not be applied until such point and only IF deemed necessary by relevant independent bodies. In the interim adoption of best practice policies will go a lot further than the proposed regulation would in 'holding the line' of water quality.</p> <p>Any regulation needs to be determined and monitored by something like but not limited to local catchment bodies, NOT Environment Southland. People who are qualified and familiar with local practice and subsequent effects concerned. A model like but not limited to Overseer in which a farmer can monitor inputs and outputs.</p> <p>Consent timeframes need to be as long as practically possible i.e. anything less than 20 years poses uncertainty in a farming model and can compromise the ability to derive income and subsequently farm values. Five year reviews could be beneficial for both parties to assess standings and potential improvements. Outcomes from these reviews are to be constructive suggestions and not to be legally binding.</p>
869.5	WILKINS Pam	Rule 20	Amend	Management plans need to be implemented in a manner that is not a financial burden to a farmer and not publicly available. I oppose the implementation of the confines of any physiographic zone until the environmental and economic benefits to the land and water quality can be scientifically proven.
873.1	WILLIAMSON James	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
877.45	WILSON Aaron	Rule 20	Oppose in part	The W&L plan needs to acknowledge the wider community in the role that needs to be played in maintaining and improving water quality. The implementation of rules that specifically target dairy farming and intensive winter grazing in the different PZ's pre-empts the limit setting process and should be only introduced as a tool after the limit setting process has finished. The rules should then come into effect at the same time across all PZs. FMPs should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.
880.49	WILSON Shannon	Rule 20	Oppose in part	The W&L plan needs to acknowledge the wider community in the role that needs to be played in maintaining and improving water quality. The implementation of rules that specifically target dairy farming and intensive winter grazing in the different PZs pre-empts the limit setting

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				process and should only be introduced as a tool after the limit setting process has finished. The rules should then come into effect at the same time across all PZs. The term “mitigations”, as written in this plan needs to be defined. FMP’s should be the cornerstone of this W&L plan and take precedence over a consenting regime.
884.1	WINTER Amy	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
888.8	WOOLHOUSE K A & J A	Rule 20	Oppose	Delete.
890.1	WRIGHT Lindsay Family Trust	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
892.2	YOUNG A R & R B Partnership	Rule 20	Oppose	The management plan start dates be extended to 2020, 2022, 2024
893.2	YOUNG A R & R B Partnership (Roseanne Young)	Rule 20	Oppose	The management plan start dates be extended to 2020.

### Rule 21 – Existing dairy farming of cows

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3.5	A P & S M Verhaegh Ltd	Rule 21	Support	Retain.
11.4	Agribusiness Consultants Ltd	Rule 21		Delete Rule 21 and wait until the Physiographic tool has a proven accuracy and offering the public the opportunity to consider it as a regulatory tool with this accuracy publicised.
12.2	Agricentre South Ltd	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
23.2	Apolima Farms Ltd	Rule 21	Support	The consent application process needs to be streamlined and simplified. The process should



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				be cheap or free, as automated as possible (on line), and simple to lodge and administer.
24.87	Aratiatia Livestock Ltd	Rule 21	Support	Retain.
25.26	Ardel Dairies Ltd	Rule 21	Oppose	Delete.
26.10	Ardoyne Farm Dairys	Rule 21		The date needs to be changed to 30 May 2018.
28.2	Aurum Farming Ltd	Rule 21(c)	Oppose	Should be compliant with rules rather than writing how to be compliant.
29.2	Austin Brothers	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
42.2	BAKER Rory	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
46.2	Balfour Engineering Ltd	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
47.11	Balfour, Wendonside & Waikaia Group	Rule 21	Support in part	Amalgamate Rule 21 with Rule 20. Propose that all existing dairy farming and intensive wintering operations have and implement a Management Plan by 30 May 2018.
48.35	Ballance Agri-Nutrients	Rule 21	Oppose in part	Amend to read: <b>Rule 21 – Existing dairy farming of cows</b> The use of land for dairy farming of cows that existed as at 30 May 2016 is a permitted activity, provided the following conditions are met: <ul style="list-style-type: none"> <li>(a) the dairy platform has a discharge consent for agricultural effluent <del>that specifies a maximum number of cows that controls effluent losses from the effluent management system in accordance with condition (b);</del> and</li> <li>(b) <del>there is no increase in the number of cows, beyond that specified in Rule 21(a); and</del></li> <li>(c) (b) a <u>Farm</u> Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken</li> </ul>

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				is listed on the Environment Southland Register of Independently Audited Self-Management Participants; and (d) (c) the activity does not occur in the Alpine physiographic zone.
54.8	Bayswater Dairy Ltd	Rule 21	Support Amend	Amend the date to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
64.13	BELGARD Family Trust (GA & JM Rauber)	Rule 21	Oppose	Farm management should not be decided on size of a property.
70.3	Betapahu Farms Ltd	Rule 21		Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
83.3	BOKSER Greg	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
84.2	BOLE Will	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
86.4	BOWMAR Ross	Rule 21	Amend	Either allow intensification or do not. The intensification should be determined by the maximum intensification in the region in question. If the maximum level needs reduced, then this should be phased in.
88.2	BRAITHWAITE Nathan	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.29	BRENTLEIGH Family Trust	Rule 21	Oppose	Expansion should be on a per hectare basis.
90.2	Brian Mahon Engineering	Rule 21	Oppose	Delete all farming restrictions base on Physiographic zones and delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
92.8	Bristol Grove Dairies	Rule 21	Oppose	Oppose dairying being specifically targeted. Amend (a) and (b) provided the stocking rate does not exceed the carrying capacity of the physiographic zone. If a farm has acquired more land

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				over time, this allows the business to grow but not to the detriment of the environment.
93.3	Broadacres Ltd	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
108.79	BYTHELL Jesse	Rule 21	Support	Retain.
118.5	Carmyllie Farm	Rule 21	Neutral	Amend so rules are the same for all.
124.1	CHAMBERLAIN Terry	Rule 21	Neutral	Support a, b and d. I support the idea to have a phased approach with a comprehensive framework provided.
140.2	CLARKE Julie	Rule 21	Support	Retain.
141.2	CLARKE Julie Ann & TUCK Roger	Rule 21	Support	Retain.
144.3	CLEARWATER Sue	Rule 21	Oppose	To revoke the “physiographic” plan in favour of a different system.
152.11	Clover Bell Ltd	Rule 21	Support	The requirement for management plans should be phased in over a period of, say, 5 years and starting with new consents and those with the longest term remaining on their current consent.
157.3	COGHLAN K P & W A	Rule 21	Oppose	I am firmly opposed to compulsory management plans.
158.3	Colin Woodrow Ltd	Rule 21	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years. This would pick up issues on farms and create good working relationships, without hassles of compliance officers being involved.
163.2	CONLAN Eddie & Judy Family Trust	Rule 21	Support	Retain.
175.3	CRACK Stephen	Rule 21	Oppose	Delete as these activities should be covered as per Federated Farmers recommendations.
183.2	CUTHBERTSON John	Rule 21	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.2	CUTHBERTSON Shane	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points

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189.32	Dairy Holdings Ltd	Rule 21		Amend Rule 21: The use of land for dairy farming of cows that existed <u>or was consented (whether or not that consent had been implemented)</u> as at 30 May 2016 is a permitted activity, provided the following conditions are met:..
191.8	DALE J M & K B	Rule 21	Oppose	Existing farmers should be able to apply for increased stock numbers before this limit is set.
194.2	DAVIE Justin	Rule 21	Oppose	Far too much time and money to be spent annually. Better off with a simple plan farmers can do themselves with a compliance check every 5 years. Make it easy to update changes without the requirement to do it annually, essentially from square 1 again.
200.3	DICKIE Alton Brent	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed by 2025.
204.3	DICKSON Grant	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed by 2025.
205.25	Dillon Ag Ltd (Chris Dillon)	Rule 21	Oppose	Expansion should be on a per hectare basis.
206.25	Dillon Ag Ltd (Rochelle Dillon)	Rule 21	Oppose	Expansion should be on a per hectare basis.
207.5	Dillon Grain Ltd	Rule 21	Oppose	Any limits imposed should be across the board. This would maintain an even economic playing field.
209.31	DIPROSE Dave	Rule 21	Support	Retain.
210.83	Director-General of Conservation	Rule 21	Support	Retain.
217.1	DRISCOLL Timothy & Jocelyn	Rule 21(c)	Support	Retain.
224.6	DUFFY Paul	Rule 21		Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils. The consent process needs to be straight forward, simple, not expensive for farmers and well explained.
225.2	DUGDALE Peter	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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243.2	ELS Luren	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
244.2	Elya Holdings Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
246.2	ENGLISH Hamish	Rule 21		Defer land use rules until limit setting process.
249.24	Ernslaw One Ltd	Rule 21	Oppose Amend	Amend part (a) of Rule 21 to limit the number of cows, for those existing dairy farms or runoff units that do not use herd homes or wintering barns, to provide INPUT rather than OUTPUT controls on Nitrate & E-Coli  Limit cow number by physiographic zone, with a further 50% seasonal reduction on any pasture underlain by subsurface drainage systems (tile pipes or perforated drainage) when soil moisture is at field capacity, Limits to be modelled on the EU Nitrate directive.
250.2	ESLER Lloyd	Rule 21	Support	Retain.
252.2	EVANS Blair	Rule 21(c)	Amend	Develop an online Management Plan that farmers can use and access without the need for consultants/external and higher costs. Should be online, drop down boxes, linked to others i.e. SDC for title areas, maps so farmers can draw in new fences, crop paddocks, ponds etc. Ideally a management plan should be simple enough that say 75% of farmers could complete without external input.
259.8	F D Enterprises Ltd	Rule 21	Support in part	Propose that all existing dairy farming and intensive wintering operations have and implement a Management Plan by 30 May <u>2018</u> .
264.6	FarmRight Ltd	Rule 21	Support in part	Support but propose that all existing dairy farming and intensive wintering operations have and implement a Management Plan by 30 May 2018.
265.84	Federated Farmers of NZ (Southland Province)	Rule 21		Amend as follows: The use of land for dairy farming of cows that existed as at 30 May 2016 is a permitted activity, provided the following conditions are met: (a) the dairy platform has a discharge consent for agricultural effluent that specifies a maximum number of cows; and (b) there is no increase in the number of cows, beyond that specified in Rule 21(a); and (c) a Management Plan is prepared and implemented in accordance with Appendix N,

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				including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants; and (d) the activity does not occur in the Alpine physiographic zone above 800m.
268.2	Fermoy Holsteins Ltd	Rule 21	Amend	A three yearly management plan with cultivation records updated as required is more realistic. One record, one rule for all farming systems.
270.2	Firdale Farms Ltd	Rule 21	Support	Retain.
277.45	Fonterra Co-operative Group Ltd	Rule 21	Oppose in part	Retain Rule 21 as a permitted activity rule for the existing farming of dairy cows. Amend the rule to include provision for a phase in period within which farms must prepare a Management Plan of 12 months from the date the regional plan becomes operative. Redraft condition (a) as follows: “(a) the dairy platform <del>has had</del> a discharge consent for agricultural effluent <u>issued on or before 30 May 2016</u> that specifies a maximum number of cows; <u>or the number of cows did not exceed 20</u> ; and...” Redraft condition (b) as follows: “(b) there is no increase in the number of cows, beyond that specified in Rule 21(a) <u>on</u> i. <u>the landholding to which the discharge consent referred to in condition (a) applies; together with</u> ii <u>any additional land added to that landholding since 30 May 2016.</u> ”
283.3	Foveaux Investments Ltd	Rule 21	Amend	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.
291.2	G J Gardner	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
312.2	GILLESPIE David	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality

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				Due diligence should be from economic, social & cultural viewpoints
313.4	GILLESPIE Maria	Rule 21	Support Amend	That over two years a phased in approach of the Farm Management Plan be implemented for existing dairy farms, and that the full Farm Management Plan be required after a two year period. It could even be implemented FMU by FMU, depending on which FMU have the greatest issues. Clarify that existing dairy farming include all land utilised as part of the dairy farm as at 30 May 2016, whether owned freehold or leased.
318.2	Glenarlea Farms Ltd	Rule 21	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
319.12	Glendhu Dairies Ltd	Rule 21	Oppose	Delete.
320.2	Gleneden Dairies Ltd	Rule 21	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
333.1	Greenbush Farms Ltd	Rule 21	Oppose	Needs to be able to be prepared, understood and taken ownership by the farmer, not complex and costly way by consultants.
339.8	GUNN Olivia	Rule 21	Support	Support but we recommend that the date is changed to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
361.9	HBG AgriLimited	Rule 21	Oppose	Amend the date from May 30 <sup>th</sup> 2016 to May 30 <sup>th</sup> 2018.
362.4	Hedgehope Grazing Ltd	Rule 21	Amend	Change the date that farm environment plans are required to reflect the amount of time it will take to acquire these.
365.4	HEENAN M D and D W	Rule 21	Support	Retain.
368.2	HENDERSON Chris (Mrs)	Rule 21	Support Amend	(a) The dairy platform has a discharge consent for agricultural effluent that specifies a certain number of cows. Add: in line with the sustainable carrying capacity of the particular soil type. (d) Support the protection of the Alpine physiographic zone. Add: Support the promotion 'Lean Dairy' use of methane from effluent ponds to create energy for on-farm.
369.12	HENDERSON Michael	Rule 21	Oppose	Delete.
381.19	HOLDER Wendy & Tom	Rule 21		Remove Policies that discriminate and prevent development. Instead address the current situation that is causing decline in freshwater.
387.12	HORRELL Andrew	Rule 21	Support	Retain.
407.2	HYLAND Maureen	Rule 21	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management

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				Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
413.2	Iron Bridge Farms Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
424.2	JARVIS Ben	Rule 21	Oppose	No specific decision requested.
428.2	Jones & Cooper Builders	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
435.2	KAY Gilbert	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
437.20	KEMPTHORNE Robert	Rule 21	Oppose in part	Increase the time frames and <b>remove</b> the isolation of any one type of farming enterprise.
438.2	KENNEDY John	Rule 21	Oppose	A management plan must be as simple as possible to enable it to be enacted easily. The more information in it the less it will be looked at however a plain management plan which has all of the <u>main</u> criteria for reducing harm to the receiving waterways will be the most effective with the main points that correspond to the physiographic zone included. Once a management plan has been enacted a full refund of the Dairy Differential Rate must be given for every year that a management plan is in place.
450.2	Kmore Farming Ltd	Rule 21	Support	Retain.
454.1	Kyler Pastorals (Braden Kyle)	Rule 21	Oppose	Allow farmers to choose how many cows they milk on their land. Delete Rule 21(b) to allow farmers to choose how many cows they milk on their land.
458.2	L R & S J Hammond Ltd	Rule 21	Support	Should phase in farm management plans. Consents due first should be done first.
464.15	Landpro Ltd	Rule 21	Support in part	We suggest the following wording for Rule 21: “The use of land for dairying farming of cows that existing at 30 May 2016 <u>including those operations which had obtained a land use consent to convert to dairying pursuant to Rule 17A of the RWPS but had not yet exercised their consent</u> is a permitted activity, provided the following conditions are met ...”  We seek the amalgamation of Rule 21 with Rule 20 and a definition of ‘dairy farming’ to be



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				included in the plan  We suggest that rule 21(c) is amended so there is a timeframe for preparing and operating a Management Plan in accordance with Appendix N, i.e. 12 months from the date of notification of the plan.
469.4	LEGG Rob & Nessa	Rule 21	Oppose	There needs to be much more clear instructions and most importantly an easy to follow template if farmers are expected to be able to write this sort of Plan. It is extensive. Farmers should be able to fill in a template with their information in a user friendly way, again minimising time and avoiding unnecessary cost. As it stands there is no template available and most farmers would have to employ a consultant to write the plan on their behalf-this is unreasonable and pointless. If you want farmers to write a true plan then you have to provide them with the tool (template) to do so, someone else writing a plan for a farmer is an exercise and will not produce any environmental gain.
471.2	LINDSAY Chris	Rule 21	Oppose	No specific decision requested.
472.2	LINDSAY Jill	Rule 21	Oppose	No specific decision requested.
473.3	LINDSAY Ray	Rule 21	Support	Make consultation with farmers a priority. Farmers should not be financially penalised by opposing new rules and costs.
474.2	LITTLE Robert Edsall	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural view points
477.6	Longwood Properties Ltd	Rule 21	Amend	We suggest that it be possible to evidence livestock numbers at any date prior to 30 May 2016 as to ensure that on-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 'live weight per hectare' measure.
478.19	LOVERIDGE David	Rule 21	Support Amend	This needs to be changed to the 30 May 2018.
479.3	Lowburn Ag Ltd (Birgit Pemberton)	Rule 21	Support	Retain.
482.13	Lower Aparima Catchment Group	Rule 21	Support in part Amend	We recommend that the date is changed to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).

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483.17	Ludell Ltd	Rule 21	Oppose	Existing farmers should be able to apply for increased stock numbers before this limit is set.
491.2	MacGregor Motors (Balfour) Ltd	Rule 21	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
492.2	MACKAY Alexander	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
493.2	MACKENZIE Toni	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
496.2	MACPHERSON Chanelle	Rule 21	Oppose	No specific decision requested.
498.2	MANN Alistair	Rule 21	Amend	Amalgamate Rule 21 and Rule 20. All existing dairy farming and intensive winter grazing operations implement a Management Plan by 30 May 2018
503.2	MARSHALL Logan	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
505.2	MARSHALL Norman	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.3	MARSHALL R C	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed by 2025.
509.2	Matai Farms Ltd	Rule 21(c)	Amend	Extend time frame until at least the end of 2018.
510.2	Mataura Butcher Shop Ltd	Rule 21	Oppose	Make permitted.
520.3	MCELLIGOTT J W & T L	Rule 21	Oppose Amend	We need more time to get this implemented.

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525.2	MCINTYRE Hayden	Rule 21	Oppose	No specific decision requested.
527.2	MCKAIN Belinda	Rule 21	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
537.4	MCKENZIE G & T Partnership	Rule 21	Oppose	Delete Management Plan requirements.
539.2	MCKENZIE Matthew	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
542.3	MCLEAN David	Rule 21	Oppose	To revoke the “physiographic” zoning plan in favour of a different system.
548.2	MCMULLEN Leith	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
560.5	MCRAE Tim & Justine	Rule 21	Oppose	Updated soil maps will give a better understanding of soil types and then future management of these
563.2	MEYER Timothy	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social & cultural viewpoints.
564.9	Mid-Aparima Catchment Group	Rule 21	Support Amend	We recommend that the date is changed to 30 <sup>th</sup> May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
569.6	MILLER R J Trust	Rule 21	Support in part	Propose that all existing dairy farming and intensive wintering operations have and implement a management plan by 30 May 2018.
571.2	MILLER Susan	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
572.3	Ministry for Primary	Rule 21	Amend	Retain the provision for implementation of any Independently Audited Self-Management

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	Industries			(IASM) schemes developed in the future, along with some amendments to provide additional clarity and certainty. Including (i) what the requirements are for IASM scheme participants in order to be listed on the IASM Register (including that they may require a farm environmental management plan) and (ii) the requirements of IASM scheme providers in order to obtain Environment Southland's approval of either the scheme or the scheme provider.
578.2	Moonlight Trust	Rule 21	Oppose	Delete Management Plan requirements.
586.7	MOUAT Family Trust	Rule 21	Support	Retain.
595.2	MURRAY Rex	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
598.2	Newton Slink Skins	Rule 21	Oppose	Make permitted.
603.4	Nithdale Station	Rule 21	Support	Retain.
618.2	Onepu Farms Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
622.22	P F Olsen Ltd	Rule 21	Oppose Amend	Review rules to reflect objectives and policies that incorporate the goal of achieving water quality targets within a "Natural Capital" framework. Ensure rules adapted to explicitly enable measures of farm performance toward the desired end state of water quality within the zone of operation and to enable adjustment of key farm operational parameters to meet water quality targets if not achieved via the bmp process.
623.2	P H Bennett Ltd	Rule 21	Oppose	Amend this rule because you are requiring all farmers to produce a new Management plan every year. This is unrealistic. Once we have a management plan and your farming practices are not changing each year then the original plan should suffice other than the odd amendment each year. Producing a new plan each year is costly and time consuming.
630.2	PATTULLO Pauline	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
632.2	Peat View Dairies Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.

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635.2	PGG Wrightsons	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
638.2	Pinnacle Farming Company Ltd	Rule 21	Amend	The timing for completion of Farm Management Plans to be extended to 31 December 2016, Farm Management Plans to allow for flexibility throughout the farming year, and to recognise that change and flexibility in systems is a natural part of farming.
639.2	PITCHER Brian	Rule 21	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
640.36	Pourakino Catchment Group	Rule 21	Support	Retain.
645.3	PRICE William	Rule 21	Oppose	The date a management plan is encouraged to be completed by 2025. Management plans should be encouraged & should not be mandatory.
647.4	Progressive Engineering Southland Ltd	Rule 21	Support	Retain.
648.2	Puke Rua Dairies Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be a cheap or free, as automated as possible (on line), and simple to lodge and administer.
649.2	Puke Tahi Dairies Ltd	Rule 21	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
656.4	RABBIDGE Stephen	Rule 21	Amend	Enforce a requirement of a Management Plan on non-compliant farmers only.
661.38	Ravensdown Ltd	Rule 21	Oppose in part	<p>Ravensdown seeks the permitted activity status of Rule 21 be retained, while amending the rule to read:</p> <ul style="list-style-type: none"> <li>• “(a) the dairy platform has a discharge consent for agricultural effluent that <del>specifies a maximum number of cows</del> controls nutrient losses from the effluent management system in accordance with (b); and ...”</li> <li>• Delete (b);</li> <li>• Amend (c) to (b) which reads:</li> </ul>

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				<p><del>“(e)-(b) a Farm Management Plan is prepared and implemented in accordance with Appendix N, which includes the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and</del></p> <p><del>provided to Environment Southland upon request, or the farming activity and property the landholding on which the activity is undertaken is listed on the Environment Southland Register of subject to an Independently Audited Self-Management scheme approved by the CEO of the Southland Regional Council Participants; and...”</del></p> <p>a Farm Management Plan is prepared and implemented in accordance with Appendix N which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, or the farming activity and the property on which the activity is undertaken is subject to an Independently Audited Self- Management scheme approved by the CEO of the Southland Regional Council.</p>
666.14	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 21	Oppose	Rule 20, 21 and 22 should all be defined the same, they should all be permitted, or they should all be discretionary.
669.2	ROBB Alfred	Rule 21	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
672.4	ROBERTSON Antony	Rule 21	Amend	Allow plans to be prepared by 1 June 2017. Allow them to be prepared by farmers themselves.
689.3	ROSS Keith	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory and encouraged to be completed by 2025.
692.3	ROWE Emma	Rule 21	Oppose	The option should be available to increase productivity as long as outputs of N remain the same/less than what they currently are, this allows for system changes and strategic increases in productivity.
693.4	ROY Bevan	Rule 21	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
699.2	Rural Livestock Ltd	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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710.6	Schrader Mains Ltd	Rule 21		Amend to: 1. The use of land for dairy farming of cows that: (a) Existed as at 30 May 2016 <u>or</u> ; (b) <u>Obtained land use consent for establishing a new dairy farm under Rule 17A of the Regional Water Plan applied for prior to 30 May 2016.</u>
711.7	SCOTT G D & M M	Rule 21	Support	Retain.
712.28	Seaview Trust & Oraka Farms Ltd	Rule 21	Support	Retain provided Physiographic Zones are removed.
714.2	SELLWOOD Luke	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
730.3	SMALLEY Timothy	Rule 21	Oppose	This may impact on our farming business and will also impact land prices for all farming throughout southland. We oppose this due to not enough professional help trained or available to help draw up plans required.
737.19	Smithill Ltd	Rule 21	Support	Retain.
740.2	South Coast Dairy Ltd	Rule 21	Oppose	Any plan needs to be able to be prepared, understood, and taken ownership of by the farmer Any practices need to focus on GMPs – going further than GMPs (ie. mitigations) will result in an uncertain risk to dairy farm businesses prior to limit setting.
748.4	Southern View Ltd	Rule 21	Support	Retain.
752.113	Southland Fish & Game Council	Rule 21	Support	Retain.
757.6	Southwest Properties Ltd	Rule 21	Amend	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 as a permitted activity. Further, we suggest that definition of stocking rate be improved from a simple ‘cows per hectare’ to a ‘live weight per hectare’ measure.
759.10	Springlands Group Ltd	Rule 21	Support in part	Amalgamation of Rule 21 with Rule 20. Propose that all existing dairy farming and intensive wintering operations have and implement a Management Plan by 30 May <u>2018</u> .

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761.9	STALKER Hanna & Callum	Rule 21	Support	We recommend that the date is changed to 30 <sup>th</sup> May 2018.
762.5	STANLEY Karen	Rule 21	Support	Critical source areas to be managed as farm environmental management plan.
768.10	STEVENSON Audrey	Rule 21	Oppose in part	Be fair – remove the isolation of any one type of farming enterprise. Increase time frames.
775.3	Stoney Creek Station Ltd	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory and the date a management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
777.6	STRATFORD Chris & Lynsey	Rule 21	Oppose	<p>The requirement for the Management Plan should be achievable. To be so, the requirement should not be operative immediately. We also suggest a staged approach to the implementation (e.g. requiring a riparian plan, map, nutrient budget in year 1 (which we suggest should start in May 2017) and on-farm visits, full plan implemented catchment by catchment in year two). This will set people up to succeed rather than fail and ensure that the support from industry/consultants etc. is ready.</p> <p>For farmers to be able to take ownership and for better outcomes to be achieved I believe that the plan needs to be able to be prepared, understood and implemented by the farmer, not done in a complex and costly way by consultants. Any practices also need to focus only on Good Management Practice. Going further than GM (into mitigations or changes to farm systems e.g. reducing stocking rate) would result in a risk to our farming business. We know limit setting is coming-requiring us to make changes before that process is unfair and is not following the correct process.</p>
788.2	Switzer's Valley Transport	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
790.7	TAIT G R & J E & Waikawa Valley Trust	Rule 21	Oppose	Costly and time consuming.
791.2	TALBOT Jeanette	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
796.2	TAYLOR Marcy	Rule 21	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.



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797.38	Nga Runanga and TRONT	Rule 21	Oppose in part	Ensure that where a hectare limit trigger is used within a permitted activity rule in rules 20-23 the limit set is reflective of the attributes of the Physiographic Zone. Retain rule as worded. However, implement measures in Appendix N requiring Management Plans to show how they will reduce contaminate levels over set timeframes.  Within the FMU process ensure the provisions, where it is shown existing farming practices have an effect, require existing farmers to reduce sediments, microbes, and nutrients levels.
798.6	TEMPLETON Luke	Rule 21	Support in part Amend	I recommend that the date is changed to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
799.7	TEMPLETON Peter	Rule 21	Support in part Amend	I don't support a rule that makes all farms non-complying before the submission/hearing process is finished. I recommend that the date is changed to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
800.3	TEMPLETON Vaughan	Rule 21	Amend	My concern here is the use of the number of cows to automatically trigger an expansion of dairying – no specific decision requested.
801.2	Terrace Farm Trust & Johnrey Trust	Rule 21(c)	Amend	Allow a period of time for implementation of farm management plans. We seek clarification of definition and interpretation of “landholding” and how these new rules will affect our existing lease of land adjoining our dairy farm.
802.24	The 254 Partnership & Gerken Family Trust	Rule 21	Oppose	Expansion should be on a per ha basis.
803.39	The Fertiliser Association of NZ	Rule 21	Amend	Amend Rule 21 as follows:  The use of land for dairy farming of cows that existed as at 30 May 2016 is a permitted activity, provided the following conditions are met:  (a) the dairy platform has a discharge consent for agricultural effluent that <del>specifies a maximum number of cows controls nutrient losses from the effluent management system;</del> and  (b) <del>there is no increase in the number of cows, beyond that specified in Rule 21(a);</del> and  (c) a <u>Farm</u> Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants; and  ( <del>d</del> -c) the activity does not occur in the Alpine physiographic zone.
807.3	The Terraces Ltd	Rule 21	Oppose	Management plans should be encouraged & should not be mandatory and the date a

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
810.34	Three Rivers Catchment Group (TRCG)	Rule 21	Support	Retain
812.2	TIDEY Allan	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
813.6	Tihaka Farms	Rule 21	Amend	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 'live weight per hectare' measure.
814.4	Timothy Farms Ltd	Rule 21	Oppose	We find this rule feeds into Rule 22 and prevents us exercising our basic property rights to expand our dairy herd/farm.
815.2	Timpany Investments Ltd	Rule 21	Amend	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.
817.21	Tomogalak Gorge Trust (Jeffery Keen)	Rule 21	Support	Retain
818.22	Tomogalak Gorge Trust (John Keen)	Rule 21	Support	Retain.
819.20	Tomogalak Gorge Trust (Linzi Keen)	Rule 21	Support	Retain.
824.3	Tulloch Farm Glendhu Ltd	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory and the date a management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
825.3	Tulloch McNab Transport Ltd	Rule 21	Oppose	Management plans should be encouraged and should not be mandatory. The date a management plan is encouraged to be completed be aligned with the NPS-FM i.e. 2025.
832.82	VAN GOOL Raewyn	Rule 21	Support	Retain.
835.2	VAN ZYL Hendrik	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.2	VAN ZYL Michelle	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
842.6	Waihoaka Holdings Ltd	Rule 21	Amend	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 'live weight per hectare' measure.
844.2	Waitea Dairies Ltd	Rule 21	Oppose	ES to provide a basic simple template plan for farmers to complete as it is impractical and unnecessary.
845.1	WALLACE Bruce & Maree	Rule 21	Amend	Needs flexibility. Timing extend deadline 31 Dec.
861.20	WHITE John Copeland	Rule 21	Support in part Amend	We recommend that the date is changed to 30th May 2018 to allow dairy farmers time to ensure that they meet the conditions, particularly condition (c).
867.2	WILKINS Donna	Rule 21		Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
873.2	WILLIAMSON James	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
877.46	WILSON Aaron	Rule 21	Support in part	Existing dairy farming of cows is a permitted activity. FMPs should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.
880.50	WILSON Shannon	Rule 21	Support in part	All existing dairy farming of cows is a permitted activity. FMPs should be the cornerstone of this W&L plan and take precedence over a consenting regime.
884.2	WINTER Amy	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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890.2	WRIGHT Lindsay Family Trust	Rule 21	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

### Rule 22 – New or expanded dairy farming of cows

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11.5	Agribusiness Consultants Ltd	Rule 22		Delete Rule 22 and wait until the Physiographic tool has a proven accuracy and offering the public the opportunity to consider it as a regulatory tool with this accuracy publicised.
12.3	Agricentre South Ltd	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
16.1	ALLEN R S & K F	Rule 22	Oppose	Blocks less than 50ha be excluded from Rule 22.
23.3	Apolima Farms Ltd	Rule 22	Support	The consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
24.88	Aratiatia Livestock Ltd	Rule 22	Oppose	That ES removes from the proposed plan all provisions which afford preferential treatment to the proposed Southland Development Hub.
25.27	Ardel Dairies Ltd	Rule 22	Oppose	Amend so that a full in-depth consideration takes place on historic purchases and as long as all environmental effects can be mitigated then consent should be granted.
29.3	Austin Brothers	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
33.4	BACON V M	Rule 22	Oppose Amend	Set all dairy conversions as a discretionary of restricted discretionary activity.
35.2	BAIRD Aaron	Rule 22	Oppose	As an alternative I propose set all dairy conversions as a discretionary or restricted discretionary activity.
37.2	BAIRD J J	Rule 22(b)	Oppose	Allow the dairy farming of cows that did not exist as of 30 May 2016 in the old Matura PZ to

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				become discretionary activity providing a management plan is in place bringing the old Mataura PZ into line with similar physiographic zones and retain (e) and (f).
38.2	BAIRD M G & R J	Rule 22(b)	Oppose	Allow the dairy farming of cows that did not exist as of 30 May 2016 in the old Mataura PZ to become discretionary activity providing a management plan is in place bringing the old Mataura PZ into line with similar physiographic zones and retain (e) and (f).
40.7	BAKER David	Rule 22	Oppose in part	Change the Old Mataura and Peat wetlands from a non-complying activity to a discretionary activity.
42.3	BAKER Rory	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
46.3	Balfour Engineering Ltd	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
47.12	Balfour, Wendonside & Waikaia Group	Rule 22	Amend	Remove the 'non-complying' activity status of activities within the Old Mataura Zone. Remove the zone and the area of land is treated as an Oxidising PZ and discretionary activity. Provide an economic assessment of Rule 22 which is accurate to the scale and significance of the rule.
48.36	Ballance Agri-Nutrients	Rule 22	Oppose in part	Retain Rule 22(a) and (f). Amend Rule 22(b) to take into account the submitters concern around applications for new and expanded dairy farming assessed against Physiographic Zone Polices 9 for the Old Mataura Zone and 11 for the Peat Wetlands Zone. Amend Rule 22(e) to reduce this potential complexity, the submitter considers that a common rule framework requiring the physiographic characteristics to be take into account in the Farm Management Plan, may be more straight forward, than having a series of different rules specific to each zone with which the activity must comply and address. Refer to original submission for detail.
54.9	Bayswater Dairy Ltd	Rule 22	Oppose	Amend the date is changed to 30th May 2018, and amend the activity status from discretionary to restricted discretionary.
62.9	Beef + Lamb NZ	Rule 22	Oppose Amend	Amend to read: (a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising,

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				<p><del>Central Plains, or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following condition is met:</del></p> <p><del>(i) a Management Plan is prepared and implemented in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p><del>(b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old Maitava, or Peat Wetlands physiographic zones is a non-complying activity.</del></p> <p><del>(c) The use of land for dairy farming of cows that does not comply with Rule 21(c) or Rule 22(a)(i) is a non-complying activity.</del></p> <p><del>(d) The use of land for dairy farming of cows in the Alpine physiographic zone is a prohibited activity.</del></p> <p><del>(e) Where new or expanded dairy farming of cows includes land in more than one physiographic zone, the rules for each physiographic zone shall apply to the land within that zone.</del></p> <p><del>(f) (b) Despite Rule 22(e), where new or expanded dairy farming of cows includes land of less than 10 hectares in any one physiographic zone, the landholder may determine whether the physiographic zone for that area, or the prevalent physiographic zone for the landholding, applies to that area of the land.</del></p> <p><del>(g) (d) Despite Rule 22(a) to (be) the use of land for dairy farming of cows is a restricted discretionary activity, provided the following conditions are met:</del></p> <p><del>(i) ...</del></p>
63.4	BEGGS N W & C E	Rule 22	Neutral	Request clarity around who is responsible for Farm Management Plans and provide templates and training.
64.14	BELGARD Family Trust (GA & JM Rauber)	Rule 22	Oppose	Farm management should not be decided on size of a property.
70.4	Betapahu Farms Ltd	Rule 22		Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
73.12	BLACK Family Trust	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
74.3	BLACK G L & R R	Rule 22	Support in part Amend	We recommend that Environment Southland does not place any rigid rules around the changing of farm practice which would devalue the current asset value of farm properties not already converted to dairying.
82.4	BLOMFIELD M J & K G Trust	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
83.4	BOKSER Greg	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
84.3	BOLE Will	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
88.3	BRAITHWAITE Nathan	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.30	BRENTLEIGH Family Trust	Rule 22	Oppose	Remove physiographic zones. ES to provide as they were meant to before this plan was notified, the Southland Economic Project.
90.3	Brian Mahon Engineering	Rule 22	Oppose	Delete all farming restrictions base on Physiographic zones and delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
93.4	Broadacres Ltd	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
102.3	Burwood Station Ltd	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
108.80	BYTHELL Jesse	Rule 22	Support	Retain.
118.6	Carmyllie Farm	Rule 22	Oppose	Farm management plans - what level of detail is appropriate? Should a nutrient budget be required for all farm types? Limit to areas for intensive winter grazing, currently 20 or 50ha limits. Should there be a percentage of landholding limit for larger farms?  We would like to see more information on what the dairy industry is doing to minimize the risk to land use under intensive farming.
123.3	Caughey Ltd	Rule 22	Oppose	I think it should be left the way it is in the current plan.

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133.3	Civil Tech Ltd	Rule 22(g)	Amend	Clarify 22(g) what this is saying.
135.3	CLARKE A W & T M Partnership	Rule 22	Oppose	Farmers should have the opportunity to farm the land within that physiographic zone in accordance with the rules of that zone. This change of rule could be covered in the farm management/environmental plan.
144.4	CLEARWATER Sue	Rule 22	Oppose	Until there is a more relevant classification for the land type I don't agree with restricting land use.
152.12	Clover Bell Ltd	Rule 22	Oppose	We would like this rule changed to a permitted activity as long as the factors in Appendix N are achievable.
155.4	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 22	Oppose	Consider each application for conversion on its own merits based on data collected from that property. Include a clause in the plan that provides landowners with the means to challenge the physiographic zones.
156.7	COCKBURN Grant & Rachel	Rule 22	Support	Clarify that any PZ less than 10ha, included in larger land area, will not be considered on its own right. i.e. if you have 8ha of peat and 100ha bedrock PZ, then the activity will be treated as the same as 108ha bedrock PZ.
157.4	COGHLAN K P & W A	Rule 22	Oppose	I am firmly opposed to compulsory management plans.
158.4	Colin Woodrow Ltd	Rule 22	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years. This would pick up issues on farms and create good working relationships, without hassles of compliance officers being involved.
160.6	COLLING Megan	Rule 22	Oppose	No specific decision requested.
161.4	COLLINS Gary	Rule 22	Oppose	No specific decision requested.
162.4	COLLINS Rachael	Rule 22	Oppose	No specific decision requested.
178.2	Crooks Dairy Ltd	Rule 22	Oppose	Consents should be able to be reviewed and renewed rather than going through the whole process again.
183.3	CUTHBERTSON John	Rule 22	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.3	CUTHBERTSON Shane	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social &



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultural view points
189.33	Dairy Holdings Ltd	Rule 22		Retain Rule 22(a) subject to amendments to Appendix N discussed at point 45 below. Retain Rule 22(f).
191.9	DALE J M & K B	Rule 22	Oppose	Limitations on expanded dairy should be excluded from the plan until affected farmers have had input.
192.8	DALE P T & S B Trust	Rule 22	Amend	Amend the constraints around the Old Matura physiographic zones to allow them to be a complying activity. Let them comply within the bounds of other zones.
194.3	Davie Justin	Rule 22	Oppose	Far too much time and money to be spent annually. Better off with a simple plan farmers can do themselves with a compliance check every 5 years. Make it easy to update changes without the requirement to do it annually, essentially from square 1 again.
200.4	DICKIE Alton Brent	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
204.4	DICKSON Grant	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
205.26	Dillon Ag Ltd (Chris Dillon)	Rule 22	Oppose	Remove physiographic zones.
206.26	Dillon Ag Ltd (Rochelle Dillon)	Rule 22	Oppose	Remove physiographic zones.
207.6	Dillon Grain Ltd	Rule 22	Oppose	Any limits imposed should be across the board. This would maintain an even economic playing field.
210.84	Director-General of Conservation	Rule 22	Support in part	Amend Rule 22 – New or expanded dairy farming of cows to read: (a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the <del>Riverine, Gleyed</del> <u>except where the soils are podsols, Bedrock/Hill Country, Oxidising, Central Plains,</u> or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following condition is met: (i) ... (b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old Matura, <u>Riverine, Gleyed podsol variant, bedrock or hill country, oxidising, Central Plains</u> or Peat Wetlands <u>(except for natural wetlands)</u> physiographic zones is a non-complying activity. (c) The use of land for dairy farming of cows that does not comply with Rule 21(c) or Rule 22(a)(i) is a non-complying activity. (d) The use of land for dairy farming of cows in the Alpine physiographic zone <u>or in the peat</u>

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				<u>wetlands physiographic zones natural wetlands or where the water quality in the underlying aquifer already exceeds Objective 8 or the water quality in the receiving water body breaches the National Bottom Lines in the NPSFWM</u> is a prohibited activity. (e) ...
224.7	DUFFY Paul	Rule 22		Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils. The consent process needs to be straight forward, simple, not expensive for farmers and well explained.
225.3	DUGDALE Peter	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
233.7	DYSON Valerie &Glyn	Rule 22	Amend	Amend rule 22(a) to be restricted discretionary activity, with matters Environment Southland exercises discretion over clearly defined.
236.1	East Dome Farms Ltd	Rule 22	Oppose	As an alternative I propose all dairy conversions set as a discretionary or restricted discretionary activity.
243.3	ELS Luren	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
244.3	Elya Holdings Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
246.3	ENGLISH Hamish	Rule 22		Defer land use rules until limit setting process.
250.3	ESLER Lloyd	Rule 22	Support	Retain.
252.3	EVANS Blair	Rule 22(b) and (f)	Oppose	Amend to allow any farmer to be able to bring in more area as per (a) if that area is less than say 30% of the total area farmed in a zone.
253.3	EVANS Frederick & BROCKMAN Carla	Rule 22	Oppose	Wait to specifically address dairy conversion rules until you see the results of all of the other water quality related changes you are imposing. Dairy conversions should be a discretionary activity as long as water quality rules are observed.
256.1	EVANS N A & M A	Rule 22	Oppose Amend	I would like to see this rule amended to a case by case basis (discretionary).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
259.9	F D Enterprises Ltd	Rule 22	Oppose	If Good Management Practices within a Management Plan can prove that under a more intensive land use that water quality is not degraded, then an assessment should be made on a farm by farm basis.
265.85	Federated Farmers of NZ (Southland Province)	Rule 22	Oppose in part	<p>Amend the rule as follows:</p> <p>(a) <del>The use of land for dDairy farming of cows that is not part of an existing consent did not exist</del> as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) <del>in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite Marine Terraces physiographic zones</del>, is a <u>restricted</u> discretionary activity, provided the following condition is met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N <del>including the mitigations relevant to the farming type being undertaken and relevant physiographic zone</del>, and provided to Environment Southland upon request, <del>or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</del></p> <p>(b) <del>The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old Maitara, or Peat Wetlands physiographic zones is a non-complying activity.</del></p> <p><u>Environment Southland will restrict the exercise of its discretion to the following matters:</u></p> <ol style="list-style-type: none"> <li>i. <u>The degree of any change in N losses from the root zone of the soil estimated using Overseer™</u></li> <li>ii. <u>Whether any increase in estimated N losses singularly or in combination with other land uses in the catchment will result in an increase in nitrate toxicity within any freshwater body in the catchment which is more than minor; and</u></li> <li>iii. <u>Whether any such increase in nitrate toxicity will result in a decline in water quality in the freshwater body to the extent that it will no longer meet the maximum nitrate concentrations for its current classification under Appendix 2 of the NPS-FM, or where it already exceeds the maximum N concentrations in Appendix 2 of the NPS-FM, any further decline.</u></li> <li>iv. <u>the quality of and compliance with and auditing of the Management Plan.</u></li> </ol> <p><u>Any resource consent application made under this rule shall not be notified and does not require service on affected parties.</u></p> <p>(c) The use of land for dairy farming of cows that does not comply with Rule 21(c) or Rule</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>22(a)(i) is a non-complying activity.</p> <p>(d) The use of land for dairy farming of cows <del>in the Alpine physiographic zone</del> <u>above 800m</u> is a prohibited activity.</p> <p><del>(e) Where new or expanded dairy farming of cows includes land in more than one physiographic zone, the rules for each physiographic zone shall apply to the land within that zone.</del></p> <p><del>(f) Despite Rule 22(e), where new or expanded dairy farming of cows includes land of less than 10 hectares in any one physiographic zone, the landholder may determine whether the physiographic zone for that area, or the prevalent physiographic zone for the landholding, applies to that area of the land.</del></p> <p>(g) Despite Rule 22(a) to (e) the use of land for dairy farming of cows is a restricted discretionary activity, provided the following conditions are met:</p> <p>(i) the activity occurs on those parcels of land wholly contained with Computer Freehold Registers SL134/119, 307310, 307311, SL198/159, and SL151/191; and Lot 5 DP 376415 as contained in Computer Freehold Register 307305, and Lots 6 and 7 DP 376415 and Part Lot 8 DP 376415 as contained in Computer Freehold Register 307307;</p> <p>(ii) the primary purpose of the activity is to contribute to publicly available research on the mitigation of environmental effects of dairy farming or wintering;</p> <p>(iii) a Management Plan is prepared and implemented in accordance with Appendix N <del>including the mitigations relevant to the farming type being undertaken and relevant physiographic zone,</del> and provided to Environment Southland.</p> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. the quality of and compliance with and auditing of the Management Plan;</li> <li>2. the proposed research to be undertaken and associated environmental effects, including methods and timing of publication;</li> <li>3. monitoring and reporting;</li> <li>4. the proposed management practices to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</li> <li>5. the potential benefits of the activity to the community and the environment.</li> </ol>
277.46	Fonterra Co-operative Group Ltd	Rule 22	Oppose in part	<p>Amend the rule from a discretionary to a restricted discretionary activity rule (and add appropriate matters of discretion).</p> <p>Redraft Rule 22 as follows:</p> <p>“(a) <u>Unless permitted by Rule 21,</u> the use of land for dairy farming of cows that did not exist as</p>

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				at 30 May 2016...”
279.68	Forest & Bird NZ	Rule 22	Oppose	<p>Amend rule 22 as follows:</p> <p>(a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the <del>Riverine, Gleyed, Bedrock / Hill Country, Oxidising, Central Plains,</del> or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following the following conditions is met:</p> <p>(b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old <del>Mataura, Riverine, Oxidising, or Central Plains Peat Wetlands</del> physiographic zones, is a non-complying activity.</p> <p>Add rule to ensure that new or expanded dairy farming in any Zone is a prohibited activity in catchments that are overallocated i.e. are below the NPSFM bottom lines</p> <p>Insert new rule providing:  <u>The use of land for dairy farming of cows that did not exist as at 30 May 2016) in the <b>Peat Wetlands</b> physiographic unit is a prohibited activity.</u></p>
284.1	FRASER Alan	Rule 22(b)	Oppose	Delete.
291.3	G J Gardner	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
295.3	Gardyne Agriculture Ltd (Fred Gardyne)	Rule 22	Oppose Amend	View conversions on a case by case basis through resource consent process. Retain prohibition in Alpine zone.
296.5	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 22(b)		Amend so dairy farming and winter grazing is a discretionary activity.
298.4	GARDYNE Joanne	Rule 22	Oppose	Change consent required to restricted discretionary for both sections (a) and (b) of rule 22.
299.15	GARDYNE John	Rule 22	Oppose	Drop the use of zones for rules and use it for education on gfm, have the economic, social and culture been looked at?
300.15	GARDYNE Jonathan	Rule 22	Oppose	Make all farming a permitted activity, effluent discharge etc. can still be via consent.
312.3	GILLESPIE David	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones Delay regulation until Good Management Practice is independently scientifically proven to be

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				ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural viewpoints
318.3	Glenarlea Farms Ltd	Rule 22	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
319.13	Glendhu Dairies Ltd	Rule 22	Oppose	Delete.
320.3	Gleneden Dairies Ltd	Rule 22	Support	Support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online) and simple to lodge and administer.
331.8	GRANT J J & J L	Rule 22		Support removing Old Mataura zone and the area is treated as an Oxidising PZ with discretionary activity. Support economic assessment of Rule 22 by ES.
336.3	GRIMM Hamish	Rule 22		No further dairy conversions should be allowed on which purchased feed for cows on that area is necessary for other than physical emergency reasons. i.e. no stacking of numbers on a 'milking platform'.
339.9	GUNN Olivia	Rule 22	Oppose	As for Rule 21, we recommend that date is changed to 30th May 2018. We recommend that the activity status be changed from discretionary to restricted discretionary.
344.4	Hall Ag Ltd (Glenda Hall)	Rule 22	Oppose Amend	View it on a case by case basis through resource consent process. Retain 22 (d)
361.10	HBG AgriLimited	Rule 22	Oppose	Amend the date from 30 May 2016 to 30 May 2018. Delete the phrase "use of land for new dairy farming". The activity status be changed from discretionary to restricted discretionary.
362.5	Hedgehope Grazing Ltd	Rule 22(b)	Oppose	Conversions in the Peat Wetland and Old Mataura physiographic zones should be a discretionary activity.
369.13	HENDERSON Michael	Rule 22	Oppose	Delete.
371.5	HENDERSON Tracy	Rule 22	Oppose	Amend to allow all areas to apply for a consent.
381.20	HOLDER Wendy & Tom	Rule 22		Remove policies that discriminate and prevent development. Instead address the current situation that is causing decline in freshwater.
387.13	HORRELL Andrew	Rule 22	Oppose	New or expanding dairy farming of cows is a controlled activity.
389.6	HORRELL P J & J M	Rule 22		Consider a temporary (N) threshold guide for future conversions to give clarity for business

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				decisions.
402.10	HUNT Alistair & Bernadette	Rule 22	Amend	Amend Rule 22(a) to make use of land for new/expanded dairy farming a restricted discretionary activity.
407.3	HYLAND Maureen	Rule 22	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
413.3	Iron Bridge Farms Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
424.3	JARVIS Ben	Rule 22	Oppose	No specific decision requested.
425.3	Jedburgh Station Ltd	Rule 22	Amend	This should be negotiable.
428.3	Jones & Cooper Builders	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
429.3	JOYCE Nathan J & Julie L	Rule 22	Support	I support ES on the proposed rule for dairy conversions. But please explain why our high standard of farm management practice and consequently the way we will now have to farm in the future, be impacted by rules and regulations being imposed on us that are set up to regulate those who have chosen detrimental ways of farming to produce what they think is greater financial gain.
433.5	Kapuka Dairies Ltd	Rule 22	Oppose	Peat wetlands and old Matura should be changed from non complying to restricted discretionary.
434.3	Kauana Dairy Ltd & Taffy Ltd	Rule 22		Does this apply to all landowners? Needs clarification. Amend activity status – discretionary versus restricted discretionary.
435.3	KAY Gilbert	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
437.21	KEMPTHORNE Robert	Rule 22	Oppose in part	Increase the time frames and <b>remove</b> the isolation of any one type of farming enterprise.
438.3	KENNEDY John	Rule 22	Oppose	A management plan must be as simple as possible to enable it to be enacted easily. The more information in it the less it will be looked at however a plain management plan which has all

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				of the <u>main</u> criteria for reducing harm to the receiving waterways will be the most effective with the main points that correspond to the physiographic zone included. Once a management plan has been enacted a full refund of the Dairy Differential Rate must be given for every year that a management plan is in place.
450.3	Kmore Farming Ltd	Rule 22	Support	Retain.
453.2	KNOWLER Rohan	Rule 22	Oppose	That conversion be discretionary and on a case by case basis.
464.16	Landpro Ltd	Rule 22	Oppose in part	We seek changing of activity status, further investigation of the economic impact of the rule on existing dairy farmers, and clarity of Rule 22(f).
469.5	LEGG Rob & Nessa	Rule 22	Oppose	There needs to be much more clear instructions and most importantly an easy to follow template if farmers are expected to be able to write this sort of Plan. It is extensive. Farmers should be able to fill in a template with their information in a user friendly way, again minimising time and avoiding unnecessary cost. As it stands there is no template available and most farmers would have to employ a consultant to write the plan on their behalf-this is unreasonable and pointless. If you want farmers to write a true plan then you have to provide them with the tool (template) to do so, someone else writing a plan for a farmer is an exercise and will not produce any environmental gain.
474.3	LITTLE Robert Edsall	Rule 22	Oppose	Delete all farming restrictions based on Physiological zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points.
479.4	Lowburn Ag Ltd (Birgit Pemberton)	Rule 22	Support	Retain.
483.18	Ludell Ltd	Rule 22	Oppose	Limitations on expanded dairy should be excluded from the plan until affected farmers had input.
486.3	M Gardyne Ltd	Rule 22(b)	Amend	If this rule is to be made there would need to be significant compensation or make dairying and winter grazing a discretionary activity.
487.3	M K H Farming Ltd	Rule 22	Oppose	Amend the old Mataura zone by treating it the same as oxidizing PZ.
491.3	MacGregor Motors (Balfour) Ltd	Rule 22	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.



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492.3	MACKAY Alexander	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
493.3	MACKENZIE Toni	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
498.3	MANN Alistair	Rule 22	Amend	Wendonside area should be changed from Old Mataura to Oxidising. Current farms should be a discretionary activity. No new dairy farms
499.2	MANN Jeffery	Rule 22 (b)	Amend	Should be a discretionary activity. Relying on new innovation to mitigate and remedy any problems.
501.2	Marlow Farms	Rule 22	Oppose	To maybe look at the percentage of soil structures that make up the individual farms and arrange a plan around the percentage of peat/wetlands that may be a concern. To see Environment Southland working with individual farms as every farm is different regarding soil structures and waterways and for Environment Southland to work with farmers to reduce their environmental footprint in a way that is sustainable for the land and farmers in all sectors
503.3	MARSHALL Logan	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
504.3	MARSHALL Lynette	Rule 22	Oppose	Change this to a discretionary activity across all zones and consider on a case by case basis instead of putting in all operations in the same category.
505.3	MARSHALL Norman	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.4	MARSHALL R C	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
510.3	Mataura Butcher Shop Ltd	Rule 22	Oppose	Make permitted.
515.6	MCCROSTIE Ray	Rule 22	Oppose	Change this to a restricted discretionary activity, rather than non-complying, across all physiographic zones.

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517.3	MCDONALD Colin & Dot	Rule 22	Oppose	No specific decision requested.
520.4	MCELLIGOTT J W & T L	Rule 22	Oppose Amend	We need more time to get this implemented.
521.3	MCEWAN Trevor & Anthea	Rule 22	Oppose	As an alternative we propose to set all dairy conversions as a discretionary or restricted discretionary activity.
522.4	McFarm Trust - Pahia	Rule 22	Oppose	Identify situations where activities can have adverse effects and manage these effects through good management practices on their farm. Use of Farm Environment Plans Catchment group participation.
525.3	MCINTYRE Hayden	Rule 22	Oppose	No specific decision requested.
527.3	MCKAIN Belinda	Rule 22	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
534.2	MCKEE Scott	Rule 22	Oppose	Amend so Rule doesn't affect land values.
536.11	McKelvie Ltd	Rule 22	Oppose	Make permitted.
537.5	MCKENZIE G & T Partnership	Rule 22	Oppose	Delete Management Plan requirements. Delete. We should have the same conditions applied to us as our existing Dairy Farm neighbours.
538.4	MCKENZIE Hayden	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity. Or farms to be able to supply a comprehensive land and water management option enabling a farm to expand or convert.
539.3	MCKENZIE Matthew	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
542.4	MCLEAN David	Rule 22	Oppose	Until there is a more relevant classification for land type I don't agree with restricting land use.
545.5	MCLEOD Emma	Rule 22e	Amend	ES to rule where more than one physiographic zone is present on farm, then each area is to be treated by the applicable rules, but not accumulatively to the whole land holding
548.3	MCMULLEN Leith	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and

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				cultural viewpoints.
553.8	McPhelzo Trust (C G & M P Pullar)	Rule 22	Amend	Set all dairy conversions as a discretionary or restricted discretionary activity.
554.9	McPhelzo Trust (Z, E & P Pullar)	Rule 22	Amend	Set all dairy conversions as a discretionary or restricted discretionary activity.
556.5	MCRAE Joe	Rule 22	Oppose	As an alternative I propose: Assess on an individual basis. Limits set need to be fair to all famers, not based on current usage.
557.4	MCRAE Matt	Rule 22	Oppose	Assess on a case by case basis. Also discuss issues of over allocation with the wider area to come up with solutions, and if necessary set limits based on evenness to all farmers, not just current dairy farmers.
559.2	MCRAE Neroli	Rule 22	Oppose	Ensure that any science used is accurate.
560.6	MCRAE Tim & Justine	Rule 22	Oppose	Updated soil maps will give a better understanding of soil types and then future management of these
563.3	MEYER Timothy	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural view points
564.10	Mid-Aparima Catchment Group	Rule 22	Oppose	As for Rule 21, we recommend that date is changed to 30 <sup>th</sup> May 2018. We recommend that the activity status be changed from discretionary to restricted discretionary.
569.7	MILLER R J Trust	Rule 22	Amend	If good management practices within a management plan can prove that under a more intensive land use that water quality is not degraded, then an assessment should be made on a farm by farm basis.
571.3	MILLER Susan	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
572.4	Ministry for Primary Industries	Rule 22	Amend	Retain the provision for implementation of any Independently Audited Self-Management (IASM) schemes developed in the future, along with some amendments to provide additional clarity and certainty. Including (i) what the requirements are for IASM scheme participants in order to be listed on the IASM Register (including that they may require a farm environmental management plan) and (ii) the requirements of IASM scheme providers in order to obtain

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				Environment Southland's approval of either the scheme or the scheme provider.
574.3	MITCHELL G B & M D	Rule 22	Oppose	No specific decision requested.
578.3	Moonlight Trust	Rule 22	Oppose	Delete Management Plan requirements.
579.1	MOORE James	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity.
583.20	MOSEBY Ryan	Rule 22 (e) & (f)	Oppose	Identify physiographic zones on farm map and use Appendix N to fit farming system around each zones rules, identify how each area is going to be managed and how the key risks are to be mitigated.
586.8	MOUAT Family Trust	Rule 22	Support	Retain.
592.3	Mt Peel Ltd	Rule 22	Support	Retain.
595.3	MURRAY Rex	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
598.3	Newton Slink Skins	Rule 22	Amend	Make permitted.
600.1	NICHOLSON Peter	Rule 22	Oppose	Should be able to convert to dairy or dairy graze.
603.5	Nithdale Station	Rule 22		Retain controls but amend to allow further expansion of dairying if, in the future, the effects on water quality are less than minor.
613.3	NZ Groundspread Fertilisers Association Inc.	Rule 22		Amend to clarify who this rule applies to and clarify the appropriate activity status i.e. discretionary or restricted discretionary.
618.3	Onepu Farms Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
619.3	Opio Milk Ltd	Rule 22	Oppose	Change activity status from 'discretionary' to 'restricted discretionary' to give some assurance and clarity over rules to be applied.
622.23	P F Olsen Ltd	Rule 22	Oppose Amend	Review rules to reflect objectives and policies that incorporate the goal of achieving water quality targets within a "Natural Capital" framework. Ensure rules adapted to explicitly enable measures of farm performance toward the desired end state of water quality within the zone of operation and to enable adjustment of key farm operational parameters to meet water quality targets if not achieved via the bmp process.

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623.3	P H Bennett Ltd	Rule 22	Oppose	Amend this rule because you are requiring all farmers to produce a new Management plan every year. This is unrealistic. Once we have a management plan and your farming practices are not changing each year then the original plan should suffice other than the odd amendment each year. Producing a new plan each year is costly and time consuming.
624.3	Paraemara Ltd	Rule 22	Oppose	Same rules should be applied as most of the other physiographic zones. Especially when this farm's physiographic description is not as described in the Old Matura model. Again should not be up to farmer to prove otherwise. Adult cows are not desirable on this country/soil during winter as it is not free draining.
630.3	PATTULLO Pauline	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
632.3	Peat View Dairies Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (on line), and simple to lodge and administer.
635.3	PGG Wrightsons	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
638.3	Pinnacle Farming Company Ltd	Rule 22	Amend	Clarification to be given as to how physiographic zones are identified. Farmers to be assisted in the cost of identifying physiographic zones. 22(b): Consider new dairy farming in those zones, but with particular management requirements on a case by case basis.
639.3	PITCHER Brian	Rule 22	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
642.4	PREBBLE Lynden	Rule 22	Oppose Amend	The economic impact of this issue needs to be established and considered before any rule can be implemented.
643.4	PREBBLE Sandra	Rule 22	Oppose Amend	As an alternative I propose the economic impact of this issue needs to be established and considered before any rule can be implemented.
645.4	PRICE William	Rule 22	Oppose	Change dairy conversions to restricted discretionary activities.

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647.5	Progressive Engineering Southland Ltd	Rule 22(a)	Support	Retain.
647.6	Progressive Engineering Southland Ltd	Rule 22(b)	Oppose	Move to discretionary.
648.3	Puke Rua Dairies Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be a cheap or free, as automated as possible (on line), and simple to lodge and administer.
649.3	Puke Tahī Dairies Ltd	Rule 22	Support	Happy to support a move to requiring a farmer to seek a consent to farm, however the consent application process needs to be streamlined and simplified. The process should be cheap or free, as automated as possible (online), and simple to lodge and administer.
652.5	PULLAR Mary	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity.
655.7	RABBIDGE Dean	Rule 22	Oppose	No specific decision requested.
656.5	RABBIDGE Stephen	Rule 22	Amend	Enforce a requirement of a Management Plan on non-compliant farmers only.
659.2	Rathfriland Ltd	Rule 22	Oppose	No specific decision requested.
661.39	Ravensdown Ltd	Rule 22	Support in part	<p>Ravensdown seeks for Rule 22 to be reviewed and amended as appropriate to be consistent with the new Policy 16 requested in this submission.</p> <p>Ravensdown supports the discretionary activity status for new or expanded dairy farming and seeks it to be retained.</p> <p>Ravensdown seeks Rule 22 to be amended to refer to a 'Farm Management Plan'.</p> <p>Ravensdown seeks Condition (g) to be amended by clarifying that it does not apply to farms that meet the permitted activity standards of Rule 22, and changing the activity status to controlled activity.</p>
666.15	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 22	Oppose	Rule 20, 21 and 22 should all be defined the same, they should all be permitted, or they should all be discretionary.
668.4	Rivervale Dairies Ltd	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
669.3	ROBB Alfred	Rule 22	Oppose	Delete all references based on Physiographic zones. Delay regulation until Good Management

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				Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
681.12	Rockytommy Farming Ltd	Rule 22	Amend	We seek that the Rule is amended, and that the 'non-complying' activity status of activities within the Old Mataura Zone is removed. We propose that instead this zone is removed and that the area of land is treated as an Oxidising PZ and discretionary activity. We also seek that Environment Southland provides an economic assessment of Rule 22 which is accurate to the scale and significance of the Rule.
682.8	Rokenwai Farming Ltd	Rule 22	Amend	We seek that the Rule is amended, and that the 'non-complying' activity status of activities within the Old Mataura Zone is removed. We propose that instead this zone is removed and that the area of land is treated as an Oxidising PZ and discretionary activity. We also seek that Environment Southland provides an economic assessment of Rule 22 which is accurate to the scale and significance of the Rule.
689.4	ROSS Keith	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
690.4	ROSS Warren	Rule 22	Oppose	Reasonable limits/restrictions are implemented.
691.4	Rossland Farming Ltd	Rule 22	Oppose	Reasonable limits/restrictions are implemented.
692.4	ROWE Emma	Rule 22	Oppose	Clarification needs to be made around buying existing dairy farms from other dairy farmers. Would a new consent be needed in this case?
693.5	ROY Bevan	Rule 22	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
694.3	ROY Bruce	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity.
695.3	ROY James	Rule 22	Oppose Amend	As an alternative I propose: set all dairy conversions as a discretionary or restricted discretionary activity.
696.1	RUDDENKLAU I & J	Rule 22	Oppose	Keep conversion conditions as they are, a controlled activity.
699.3	Rural Livestock Ltd	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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704.4	Ryan Farms 2006 Ltd	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
705.2	SALLIS Robin	Rule 22	Support	I support rule 22 and commend the council particularly for subsections (b) and (d).
706.11	Sandy Creek Trust	Rule 22	Oppose	Amend to be considered on a farm-farm basis.
710.7	Schrader Mains Ltd	Rule 22		Amend Rule 22(a) as follows: The use of land for dairy farming of cows that did not exist as at 30 May 2016 <u>or had not obtained land use consent under Rule 17A of the Regional Water Plan applied for prior to 30 May 2016</u> or does not comply with Rule 21(a) or 21(b) in the Old Mataura, or Peat Wetlands physiographic zones is a non-complying activity. Amend Rule 22(b) as follows: The use of land for dairy farming of cows that did not exist as at 30 May 2016 or <u>had not obtained land use consent under Rule 17A of the Regional Water Plan applied for prior to 30 May 2016</u> or does not comply with Rule 21(a) or 21(b) in the Old Mataura, or Peat Wetlands physiographic zones is a non-complying activity.
711.8	SCOTT G D & M M	Rule 22(e)(f)	Oppose	If there are small areas of different physiographic zones within a landholding, as long as those small areas are treated differently to the other zones with good management practice, there is no need to change rules.
712.29	Seaview Trust & Oraka Farms Ltd	Rule 22	Oppose	Recommend giving priority to existing consents regardless and allowing for increase in land area if consent number are within compliance. Recommend that New or Expanded dairying also is a restricted discretionary activity.
714.3	SELLWOOD Luke	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
715.3	SHALLARD David & Kim	Rule 22	Oppose	No specific decision requested.
716.3	SHALLARD Mark & Tania	Rule 22	Oppose	As an alternative I propose: Set all dairy conversions as a discretionary or restricted discretionary activity.
718.10	Shallow Croft Ltd	Rule 22	Oppose Amend	Amend Rule 22 with regards to Old Mataura to enable intensification.
724.3	SHIRLEY Wayne & Gaye	Rule 22	Oppose	Delete.



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726.5	Slattery Trust	Rule 22	Oppose	We seek that the non-complying activity status within the Old Maitara zone be removed. We propose that this zone be treated as an oxidising zone and be a discretionary activity.
730.4	SMALLEY Timothy	Rule 22	Oppose	We oppose this due to not enough professional help trained or available to help draw up plans required.
747.6	Southern Star Farms Ltd	Rule 22	Oppose	Change new or expanded dairy farming to a restricted discretionary activity, rather than non-complying, across all physiographic zones.
748.5	Southern View Ltd	Rule 22	Oppose	No specific decision requested.
752.114	Southland Fish & Game Council	Rule 22	Support in part	Amend rule 22 to provide: “(a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the <del>Riverine, Gleyed, Bedrock / Hill Country, Oxidising, Central Plains,</del> or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following the following conditions is met:  (b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old Maitara, <del>Riverine, Bedrock / Hill country, Oxidising, or Central Plains</del> <del>Peat Wetlands</del> physiographic zones, is a non-complying activity.
752.115	Southland Fish & Game Council	Rule 22	Support in part	Amend all references to the Peat Wetlands physiographic unit in Rule 22 and other Rules in the pWLP to make it clear that it excludes natural wetlands as follows: “ . . . Peat wetlands ( <u>excluding natural wetlands</u> ) . . .”
759.11	Springlands Group Ltd	Rule 22	Amend	We seek the that the Rule is amended, and that the ‘noncomplying’ activity status of activities within the Old Maitara Zone is removed. We propose that instead this zone is removed and that the area of land is treated as an Oxidising PZ and discretionary activity. We also seek that ES provides an economic assessment of Rule 22 which is accurate to the scale and significance of the Rule
761.10	STALKER Hanna & Callum	Rule 22	Oppose	We recommend that the activity status be changed from discretionary to restricted discretionary. We recommend that the date is changed to 30 <sup>th</sup> May 2018.
762.6	STANLEY Karen	Rule 22	Support	Retain Physiographic Zones. Critical source areas to be managed as farm environmental management plan.
766.5	STEVENS Brendon	Rule 22	Oppose	Amend the rule that the non-complying activity status for Old Maitara be changed to discretionary activity.

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767.6	STEVENS David	Rule 22		The proposed Rule 22f should take into account larger land holding sizes e.g. a 250 ha or larger property with 125ha in the Old Matura and 125 ha in the Gleyed physiographic zone.  Farmers should have the opportunity to farm the land within the predominant physiographic zone in accordance with the rules of that zone. This change of rule could be covered in the farm management/environment plan.
768.11	STEVENSON Audrey	Rule 22	Oppose in part	Be fair – remove the isolation of any one type of farming enterprise. Increase time frames.
771.12	STEWART Family Trust (Trevor Stewart)	Rule 22	Oppose	Slow down on dairy conversions. We are receiving contamination from dairying now.
772.2	STEWART Ronald	Rule 22	Oppose	Set out guidelines and rule to allow new dairying to be allowed as a consented activity in Old Matura zone. Compensation needs to be paid to landholders for the devaluing of land if this rule is not suitably changed.
773.5	STEWART Rory	Rule 22	Oppose	Set out guidelines and rules to allow new dairying to be allowed as a consented activity. Compensation needs to be paid to landholders and owners for the devaluing of farm land if this rule is not suitably changed.
774.5	STEWART Vanessa	Rule 22	Oppose	Slow down on dairy conversions. We are receiving contamination from dairying now.
775.4	Stoney Creek Station Ltd	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
779.3	Strathallan Trust	Rule 22	Amend	Allow controlled winter grazing of R 2yr heifers May to August.
780.3	Strathfair Farms	Rule 22	Oppose	Needs more work and time before implementing.
786.5	SUTHERLAND Kevin & Ann	Rule 22	Oppose	Set all dairy conversions as a discretionary or restricted discretionary activity.
788.3	Switzer's Valley Transport	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
790.8	TAIT G R & J E & Waikawa Valley Trust	Rule 22	Oppose	Costly and time consuming.
791.3	TALBOT Jeanette	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and

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				cultural viewpoints.
792.24	TAYLER Matthew	Rule 22	Support in part Amend	Rule 22(f) – the threshold should be 20ha or 10% of landholding, whichever is smaller. 20ha would be consistent with other parts of the plan.
796.3	TAYLOR Marcy	Rule 22	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
797.39	Nga Runanga and TRONT	Rule 22	Support in part	<p>Ensure that where a hectare limit trigger is used within a permitted activity rule in rules 20-23 the limit set is reflective of the attributes of the Physiographic Zone.</p> <p>Amend Rule 22(a) as follows:</p> <p>(a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the <del>Riverine</del>, Gleyed, Bedrock/Hill Country, <del>Oxidising</del>, Central Plains, or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following condition is met: ...</p> <p>Retain remainder of 22(a) as worded.</p> <p>Amend Rule 22(b) as follows:</p> <p>b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Old Matura, <del>Oxidising</del>, <del>Riverine</del> or Peat Wetlands physiographic zones is a non-complying activity.</p> <p>And</p> <p>Retain 22(c) - (g) as proposed.</p>
800.4	TEMPLETON Vaughan	Rule 22	Amend	My concern here is the use of the number of cows to automatically trigger an expansion of dairying – no specific decision requested.
802.25	The 254 Partnership & Gerken Family Trust	Rule 22	Oppose	Remove physiographic zones.
803.40	The Fertiliser Association of NZ	Rule 22	Support in part Amend	<p>Amend Rule 22 as follows:</p> <p>(a) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) or 21(b) in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones, is a discretionary activity, provided the following condition is met:</p>

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				<p>(i) a <u>Farm</u> Management Plan is prepared and implemented in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</p> <p>(b) The use of land for dairy farming of cows that did not exist as at 30 May 2016 or does not comply with Rule 21(a) <del>or 21(b)</del> in the Old Matura, or Peat Wetlands physiographic zones is a non-complying activity.</p> <p>.....</p> <p>(g) Despite Rule 22(a) to (e) the use of land for dairy farming of cows is a restricted discretionary activity, provided the following conditions are met:</p> <p>.....</p> <p>(iii) a <u>Farm</u> Management Plan is prepared and implemented in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland.</p> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p> <p>1. the quality of and compliance with and auditing of the <u>Farm</u> Management Plan; .....</p>
807.4	The Terraces Ltd	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
811.19	THYS Herman & STAUT Tinneke	Rule 22	Oppose in part	<p>Apply farmer discretion for land in more than one physiographic zone, to the biggest zone, with some restrictions to the discretionary zones.</p> <p>Expanding dairy farm area without expending the consented cow numbers is a permitted activity provided the normal conditions are met and/or extra conditions specific to certain physiographic zones are met.</p>
812.3	TIDEY Allan	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
814.5	Timothy Farms Ltd	Rule 22	Oppose	Clarify how ES is going to be able to conclusively define exactly which areas of landholdings are subject to Old Matura Soil? Or is this going to be left to farmers to incur even more expense by retaining the services of engineers/scientists to argue this battle for us?
817.22	Tomogalak Gorge Trust	Rule 22	Support	Retain

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	Jeffery Keen			
818.23	Tomogalak Gorge Trust (John Keen)	Rule 22	Support	Retain.
819.21	Tomogalak Gorge Trust (Linzi Keen)	Rule 22	Support	Retain.
820.8	TOPHAM Jeanette	Rule 22	Oppose	Change non-complying to discretionary consent in the Old Mataura or Peat Wetlands.  22(c) needs to be changed to include: if a neighbouring existing dairy farm is purchased, then this is treated as an existing dairy farm, and is allowed to activate Rule 21. This is not a new or expanded dairy farm and shall be deemed to be an existing dairy farm.
821.3	TOSH David	Rule 22	Oppose	No specific decision requested.
822.3	Tremaine Farming Partnership	Rule 22	Oppose	Remove Rule 22 (b) entirely and incorporate all PZ's into Rule 22(a)
824.4	Tulloch Farm Glendhu Ltd	Rule 22	Oppose	Dairy conversions become restricted discretionary activities.
825.4	Tulloch McNab Transport Ltd	Rule 22	Oppose	Amend activity status from non-complying to restricted discretionary.
826.2	TURNER Jonny	Rule 22	Oppose	I suggest that anyone who can show they can farm sustainably and responsibly should be able to apply for resource consent to practice dairy farming.
827.4	TURNER Paul & Kayleen	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
830.4	Upper Aparima Catchment Group	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
832.83	VAN GOOL Raewyn	Rule 22	Support	Retain.
833.4	VAN ROOIJEN Marcel	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary.
835.3	VAN ZYL Hendrik	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.3	VAN ZYL Michelle	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good

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				Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
845.2	WALLACE Bruce & Maree	Rule 22(b)	Oppose	Adjacent farms should be allowed in safe zone – and good history with environment.
856.4	West Range Farms Ltd (Bronwyn Chamberlain)	Rule 22	Oppose	Change activity from discretionary to restricted.
857.4	West Range Farms Ltd (Derek Chamberlain)	Rule 22	Oppose	Change activity from discretionary to restricted, to give some assurance and clarity over rules to be applied.
862.2	WHITE Malcolm & Pauline	Rule 22	Support	Support consents for property practice or use to change, is a good idea, to make sure it is suitable and sustainable.
863.1	Whiterig Dairy Farm	Rule 22	Oppose	Oppose 22b Where is the science behind no dairy farming on Old Mataura physiographic zones. Will the different zones have to be fenced – financial impact.
867.3	WILKINS Donna	Rule 22		Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
868.17	Wilkins Farming Ltd	Rule 22 (b)	Oppose	Remove “Old Mataura” from rule 22 (b).
873.3	WILLIAMSON James	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
875.4	Willowbank Farms 2015 Ltd & Avondale Dairies	Rule 22	Oppose	Change activity status from discretionary to restricted discretionary to give some assurance and clarity over rules to be applied.
877.47	WILSON Aaron	Rule 22	Oppose in part	A robust economic impact report needs to be completed with regards to the impact on implementation of Rule 22. Rule 22 should only be applied after the limit setting process has been completed. Rule 22(e) needs clarification of its meaning and intent. Rule 22(f) needs to be better defined as to what method or how the area less than 10ha is to be determined. FMPs should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.
880.51	WILSON Shannon	Rule 22	Oppose in part	A robust economic impact report needs to be completed with regards to the impact on implementation of Rule 22. Rule 22 should only be applied after the limit setting process has

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				been completed. Rule 22(e) needs clarification of its meaning and intent. Rule 22(f) needs to be better defined as to what method or how the area less than 10ha is to be determined. FMPs should be the cornerstone of this W&L plan and take precedence over a consenting regime.
884.3	WINTER Amy	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
890.3	WRIGHT Lindsay Family Trust	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
892.3	YOUNG A R & R B Partnership (Andrew Young)	Rule 22	Oppose	As catchment limits have not been set yet I would suggest all dairy conversions are classed as a discretionary activity and consent be approved on an individual basis.
893.3	YOUNG A R & R B Partnership (Roseanne Young)	Rule 22	Oppose	As catchment limits have not been set yet, I would suggest all dairy conversions are classed as a discretionary activity.

### Rule 23 – Intensive winter grazing

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
1.2	A J & S R Currie Ltd	Rule 23	Oppose	More than 50ha and more funding required for farmers to look at alternative winter feed options – barns, sheds, etc.
3.6	A P & S M Verhaegh Ltd	Rule 23	Amend	Preferable to have a percentage based rule.
5.13	ADAMS A J & P G	Rule 23	Amend	There should be different definitions for farms who take on extra stock for winter grazing, and farms who graze their own capital stock. There should be different rules for different classes of stock or have an effects based plan instead of risk based. The 50 hectare limit should be the minimum and larger properties should be based on a percentage of the total area of the property. Buffers need to be based on effects, not risks. Scrap requirement to map drains and work on effects based plan.

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6.1	ADAMS Jules	Rule 23		The threshold be based on a total budgeted tonnage of winter fodder crop including budgeted supplement planned to be fed in. set default tonnage figures in the first instance for farmers to use in their FMP's (for example: fodder 25t, kale 15t, swedes 12t, turnips 7t/hect, 5t post January, grain green feed 5t/hect) with the ability for farmers to deviate from default but that would require ES review.
7.4	AdBest Partnership	Rule 23	Oppose	We think it much fairer to apply a percentage of total area to be wintered instead of a fixed number of hectares (20 and 50 in the Plan). The original 15% of total landholding, as in the previous working draft, was not based on any scientific evidence. If it eventually would turn out to be scientifically based, we would be happy with it. Total landholding in this case should be defined as all land belonging to the farming unit and used as such: dairy platform plus run-off.
8.1	AFFLECK Christopher	Rule 23	Oppose	The area should be 20 or 50 hectares of part of a 200 hectare block.
11.6	Agribusiness Consultants Ltd	Rule 23		Delete and replace with a rule for all winter crops. As below, a) Establish a last date for nitrogen application on winter forage crops. This could vary annually. b) Require all farmers to have a 150mm soil test completed prior to crop establishment. Total nitrogen availability should be a requirement of the test.
12.4	Agricentre South Ltd	Rule 23	Oppose	Delete all farming restrictions based on Physiological zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural viewpoints.
13.3	All In Ltd	Rule 23	Oppose	The wintering of a farm business's own stock should be a permitted activity. Avoidance of consenting process.
14.4	ALLAN Frazer & Karen	Rule 23	Amend	To allow intensive grazing of each physiographic zone on each property to the recommended area e.g. if your farm has Old Mataura and Gleyed zones then 20ha of the Old Mataura zone can be intensively grazed and 50ha of the Gleyed zone can be grazed. A percentage of your farm size, 8% should be enough to grow sufficient winter feed.
19.4	Allison Family Farms Ltd	Rule 23		Replace winter grazing areas with percentage of total land area.
19.5	Allison Family Farms Ltd	Rule 23		Amend the buffer zones to make them more practical – see submission for more details.
20.2	ANDERSON Robert	Rule 23	Oppose	No specific decision requested
22.2	Aparima Bridge Farm	Rule 23	Oppose	Needs to be a percentage like 18 percent.



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23.4	Apolima Farms Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of land holding rather than a set number of hectares.
24.89	Aratiatia Livestock Ltd	Rule 23	Oppose	Abandon the fixed 50 hectare winter cropping limit in favour of a mixed rule: capping winter grazing at the greater of either 10 percent of effective area of each landholding or 50 hectares.
25.28	Ardel Dairies Ltd	Rule 23	Oppose	If limits have to be placed before the need of consents then it should be on a percentage basis allowing the common sense of soil type/crop/stock class solution to be evaluated.
26.11	Ardoyne Farm Dairys	Rule 23		We should be able to put in 50 hectares with the maximum of 20 hectares on peat or old Mataura. Amend 23(b)(ix) to allow for some discolouration or sedimentation following adverse weather events.
27.2	Arkley Farm Ltd	Rule 23		Instead of 20 & 50 ha replace with: -20ha or 10% of land area, which ever is larger on Old Mataura and Peat Wetland zones. – 50ha or 20% of land area, which ever is larger on all other zones. Delete restrictions in 23(c)(i) that grandparent losses and land use.
28.3	Aurum Farming Ltd	Rule 23	Oppose	Should not be one size fits all.
29.4	Austin Brothers	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
30.2	Avon Downs Ltd	Rule 23	Amend	Restriction on grazing areas for winter grazing linked to land holding and not percentage of land.
31.6	AYERS Warren	Rule 23(b)(iv)	Amend	Amend to 15% of total landholding farmed by the business. Remove any reference to intensive winter grazing
32.7	B D Farm Trust	Rule 23	Support Amend	Amend Rule 23 - 50 ha for properties under 400 ha and 15% for larger entities.
33.5	BACON V M	Rule 23	Oppose Amend	Map only new or upgraded drains and use nutrient traps to retain nutrients rather than be lost to water ways.
34.2	BAIRD A J & L S	Rule 23	Oppose	Change 23(b)(iv) 50ha limit for large scale sheep and beef units to 15% of landholding is able to be cropped before consent is required.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Rule 23(b)(viii) Current fenced off duck ponds with riparian strips remain status quo.
37.3	BAIRD J J	Rule 23	Oppose Amend	Rule 23(b)(iii) The maximum area of intensive winter grazing to be undertaken on a land holding within the old Mataura physiological zone should be allocated to 20 percent of the total land holding. Rule 23(b)(vi) The location of any known sub-surface drains within the area of land used for intensive winter grazing and their outlet position and relative depth, is mapped and provided to Environment Southland upon request. Retain 23(c)(i). Rule 23(c)(iii) Clearly define what general good management practices are that needs to be implemented in the management plan.
38.3	BAIRD M G & R J	Rule 23	Oppose in part	Amend 23(b)(iii), the maximum area of intensive winter grazing to be undertaken on a landholding within the old Mataura physiographic zone should be allocated to 20 percent of the total landholding.  Rule 23(b)(vi): Amend the location of any known sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to ES upon request.  Rule 23(b)(viii): Define Lakes or coastal marine areas to lakes and wetlands that have been named.  Retain Rule 23(c)(i)  Rule 23(c)(iii) Clearly define what general good management practices are that needs to be implemented in the management plan.
39.3	BAIRD N J & S A	Rule 23	Oppose	We propose that intensive winter grazing be a percentage based on total landholding.
40.8	BAKER David	Rule 23	Oppose Amend	Drop management plan and use land sustainability officers. Change the area allowed to be intensively winter grazed from a set hectare base to a percentage of total land area i.e. 15 to 20% or a combination of both land area and stock units. Remove the need to map tile drains. Make the maximum vegetative strip width of 10m. Remove Rule 23(b)(ix) from plan.
41.1	BAKER Isles	Rule 23	Oppose	Rule 23(b)(iii) should be based on a percentage of land area owned rather than a set 20

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				hectares, at least 20% of area of land owned before a consent is required. Retain 23(c).
42.4	BAKER Rory	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
43.5	BAKER Shane & SHAW Wendy	Rule 23		Percentage of land area that is sustainable would seem more logical e.g. 20% of land area, depending on management systems. Clarify where this figure of 50ha came from. This should be at the farmer's discretion if they choose to winter stock on farm and how many hectares, so long as there are no negative outcomes on the receiving environment.
44.2	BAKER Wendy	Rule 23	Support	Retain.
46.4	Balfour Engineering Ltd	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
47.13	Balfour, Wendonside & Waikaia Group	Rule 23	Oppose	We propose a percentage based approach as per the draft copy of the PSWLP on the basis that it is a fairer measure and will be more reflective of each property, thus we propose 25 - 30 % threshold as a permitted activity. We seek clarity of the definition of a lake to be included within the PSWLP and that a 3 m buffer applies to intensive winter grazing adjacent to duck ponds. Clarify what a land use consent may look like, the likely duration and the requirements to continue intensive winter grazing in future. Amend Rule 23(b) – 23(f) to apply from 30 May 2020.
48.37	Ballance Agri-Nutrients	Rule 23	Support in part	Support the intent of Rule 23, submitter is concerned that activities such as a storm event may cause non-compliance with clause (b), part (ix) of Rule 23.  It would be more appropriate to implement Industry Agreed Good Management Practices in response to overland flow of run-off water that does not cause a conspicuous discoloration of any adjacent waterbody. See original submission for detail.
49.4	BARCLAY Todd (Member of Parliament –	Rule 23	Oppose	I oppose the hectare limit imposed by this Plan as there is not a viable alternative for farmers to manage their stock through this period. The promotion of Good Management Practices

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	Clutha Southland)			around intensive winter grazing has the ability to allow the province to “hold the line” on water quality without risking animal health and farming viability.
51.1	Barkman Farming Ltd	Rule 23		Remove restrictions on peat wetlands and amend maps so they are more accurate.
53.1	BAVIN Jono	Rule 23	Oppose	Replace with a percentage of land to be winter cropped I believe timeframes are too short e.g. Rule 23(e). This does not give enough time for people to think about changing how long they winter graze.
54.10	Bayswater Dairy Ltd	Rule 23	Oppose	Remove any reference to any area. Support management plans in accordance with Appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for B (ix) to allow for adverse weather events.
55.2	BEATON G J & V R Family Trust	Rule 23	Amend	Amend Rule 23(b)(iii) to clarify how properties are dealt with that lie across multiple zones.
56.5	BEATTIE Michael & Lynley	Rule 23	Oppose	I propose 15-20% of your total landholding without needing consent is a fairer option for large & small farms than the 50Ha limit.
57.2	Beaumont Station (Glen Minty)	Rule 23	Oppose	Amend the permitted intensive winter grazing limit to a percentage, rather than a blanket amount to reflect the differing sizes, intensity and physiographical zones. Alternatively, increase the intensive winter grazing limit on bedrock/hill country to 200 hectares.
58.2	Beaumont Station (Lynn Minty)	Rule 23	Oppose	Amend the permitted intensive winter grazing limit to a percentage, rather than a blanket amount to reflect the differing sizes, intensity and physiographical zones. Alternatively, increase the intensive winter grazing limit on bedrock/hill country to 200 hectares.
59.2	Beaumont Station (Struan Minty)	Rule 23	Oppose	Amend the permitted intensive winter grazing limit to a percentage, rather than a blanket amount to reflect the differing sizes, intensity and physiographical zones. Alternatively, increase the intensive winter grazing limit on bedrock/hill country to 200 hectares.
60.1	BEE Carole	Rule 23	Oppose	Include a total allowable area of winter crop based on realistic requirements per stock numbers on each farm which can only be increased by consent.
62.10	Beef + Lamb NZ	Rule 23	Oppose Amend	Amend Rule 23 as follows:  a) Until 30 May <del>2018</del> <u>2020</u> , the use of land for intensive winter grazing is a permitted activity.  b) (b) From 30 May <del>2018</del> <u>2020</u> , the use of land for intensive winter grazing is a permitted activity, provided the following conditions are met:

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				<p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, <del>or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants;</del></p> <p><del>(ii) no intensive winter grazing is undertaken in the Alpine physiographic zone;</del></p> <p><del>(iii) not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the Old Maitaura, or Peat Wetlands physiographic zones;</del></p> <p>(iv) not more than <u>10 percent of a landholding effective area or 50 hectares</u> of intensive winter grazing is undertaken on a landholding <del>within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces</del> physiographic zones;</p> <p>(v) the area of land used for intensive winter grazing is recorded for each year and provided to Environment Southland on request;</p> <p>(vi) the location of any <u>new sub-surface drains or the maintenance or upgrading of existing sub-surface drains</u> within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;</p> <p>(vii) a vegetated strip is maintained, and <u>cattle<sup>7</sup> and deer<sup>8</sup></u> <del>stock</del> excluded from, the outer edge of the bed of <u>a surface waterbody any river, wetland, modified watercourse or artificial watercourse</u> for a distance of:</p> <ol style="list-style-type: none"> <li>1. 3 metres from the outer edge of the bed on land with a slope <u>up to of</u></li> </ol>

<sup>7</sup> From 1 May 2022 as sought in subsequent amendment

<sup>8</sup> From 1 May 2024 as sought in subsequent amendment

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>less than <u>410</u> degrees; and</p> <p>2. 10 metres from the outer edge of the bed on land with a slope between <u>104</u> and <u>1620</u> degrees; and</p> <p>3. <u>20-15</u> metres from the outer edge of the bed on land with a slope <u>between</u> of greater than <u>1620</u> and 30 degrees; and</p> <p>(viii) the winter grazing does not occur within <u>400-20</u> m of the outer edge of the bed of any lake or the Coastal Marine Area;</p> <p>(ix) <del>overland flow of run-off water does not cause a conspicuous discolouration or sedimentation of any adjacent waterbody.</del></p> <p>⇒ From 30 May <u>2018, 2020</u> the use of more than <u>520</u> hectares of a landholding <u>or 10 percent of a landholding's effective area</u> for intensive winter grazing <u>that does not comply with Rule 23 (b) in the Old Maitaura, or Peat Wetlands physiographic zones or 50 hectares in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite Marine Terraces physiographic zone</u> is a restricted discretionary activity, <u>provided the following conditions are met:</u></p> <p>(i) <del>the area of land used on the landholding for intensive winter grazing has not increased beyond the area of land used, averaged over the previous three years;</del></p> <p>(ii) <del>conditions (v) to (ix) of Rule 23(b) are met; and</del></p> <p>(iii) <del>a Management Plan has been prepared in accordance with Appendix N;</del></p>
63.5	BEGGS N W & C E	Rule 23	Oppose	Consideration be given to making the requirements less onerous and more practical.
64.15	BELGARD Family Trust (GA & JM Rauber)	Rule 23	Oppose	Farm management should not be decided on size of a property.
66.2	Ben Callum Station Ltd	Rule 23	Oppose	Amend rules 23(b)(iii) to percentages.
67.3	Benmore Downs Ltd	Rule 23		Change the area of land to a percentage of farmed area.
69.1	Best AG Ltd	Rule 23	Amend	Depending on the land type, we think intensive grazing should be the greater of 20 – 50 ha or 15% of your total area. Delete (vi) and replace with <u>'any known or new sub-surface drains</u>

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				<u>need to be mapped.</u>
70.5	Betapahu Farms Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of the landholding rather than a set number of hectares.
71.1	Beulah Organics NZ (BONZ)	Rule 23		Restrictions on intensive grazing and cultivation on certain angles would be very hard to legislate on our hill country farm where total effective area is required for our current farming regime.
73.13	BLACK Family Trust	Rule 23	Oppose	Clarity if where a landowner owns more than one property, will they be classed as one even though they are not adjoining. Amend the rule so that 15% of the total effective area could be cropped for winter grazing. And only require new and upgraded drains to be mapped.
74.4	BLACK G L & R R	Rule 23	Oppose	We recommend that Environment Southland: Remove all reference to areas or percentages of land holdings from the plan. Wintering your own stock on your property should be a permitted activity. The wintering of large numbers of other farmers stock should be a controlled activity.
79.3	BLAIR Phillipa Mary	Rule 23	Oppose	A 10% landholding limit would be a better option.
80.18	BLAKELY Barney & Stephanie	Rule 23	Oppose	Amend to remove restrictions on hill country and hill country farmers should be allowed to consult with ES and work together and plan manageable ways for hill country farms to adapt.
81.21	BLAKELY Hamish & Hannah	Rule 23	Oppose	This rule should be changed to include the farm size in relation to stock unit carrying capacity or the clause should be removed from the plan. Rule 23(b)(iv) should be changed to include the farm size in relation to stock unit carrying capacity or the clause should be removed from the plan. We oppose Rule 23(b)(vii) as it is not practical for hill country farming. Hill country farmers should be allowed to consult with ES and work together and plan manageable ways for hill country farms to adapt.
82.5	BLOMFIELD M J & K G Trust	Rule 23	Oppose	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.
83.5	BOKSER Greg	Rule 23	Oppose	Push out the date to 2025 to align with the NPS-FM. Remove condition relating to farm management plans and replace with encourage. Amend (b)(iv) to the greater of 50ha or 20% of the total property. Remove rule (b)(vii) 2&3. Amend (b)(vii) 1. to remove references to slope. Amend (b)(vi) to require mapping of any new or redeveloped drains only.

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84.4	BOLE Will	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
85.3	BOWMAR Lindsay & Joanne	Rule 23	Oppose	Rewrite these rules with farmer's best interests and use best practise rather than enforcing Appendix N.
87.2	Braemore Farms Ltd	Rule 23	Amend	For properties over 300ha the intensive winter grazing threshold could be 15% of the total effective area. Or could be worked on a stock unit wintered basis. Only map known history and new drains going forward. Amend vegetated strips to be half of what is stated in the draft plan.
88.4	BRAITHWAITE Nathan	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.31	BRENTLEIGH Family Trust	Rule 23	Oppose	If Ha limits remain it will drive bad practice. Remove "Landholding" from the plan and replace with "Title". GMP should include stock class. Cows should not be wintered on heavy soils. Forage oats and regrowth crops should be left out of wintering.
90.4	Brian Mahon Engineering	Rule 23	Oppose	Delete all farming restrictions base on Physiographic zones and delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
91.3	Bridesdale Farming	Rule 23	Oppose	Base areas on a per farm percentage of 25-35% to allow sufficient area to graze. Furthermore 23 (c) (i) needs to be removed as this disables ability to adapt to changing markets, essentially this grandparenting which needs to be left out.
92.9	Bristol Grove Dairies	Rule 23	Amend	Rule 23(b) & (c): The amount of land used for winter grazing needs to be a function of the number of consented stock units. Example, if a farmer has consent to milk 1000 cows, they would need approximately 80ha to winter those animals. Rule 23 (b)(vii) Amend buffer zone to one metre for every degree of slope and clarify if ES will collect rates on this land now that it has become unusable? Will they be paying for the upkeep, weed and pest control of this land? Will they compensate the drop in value from the purchase price paid for this land?
93.5	Broadacres Ltd	Rule 23	Oppose	Amend the date to 2025 to align with the NPS-FM. Remove the condition relating to Farm Management Plans and replace with encourage. Amend (b)(iv) to the greater of 50 ha or 20%



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				of the total property and remove (b)(vii) 2 and 3. Amend (b)(vii) 1 to remove references to slope. Amend (b)(vi) to require mapping of any new or redeveloped drains only.
94.4	Brooklea Farm Ltd	Rule 23	Oppose in part	A percentage based approach would be fairer along with a good farm management plan, historic farming business plans, using the physiographic zones could then guide farmers in their practices. Amount of large scale properties with large stock units and large undeveloped area would require a different context around a percentage. Has to be fair to all farmers, don't want to see farmers pitching against other farmers.
96.1	BROWNING Stuart	Rule 23	Oppose	Alter the rule to limit the total area intensive winter grazing of a landholding to 15%. With a restriction for Peat and Old Mataura of 10%.  Clause (b) (vi) should read "the known location of any sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;"
97.3	Brunel Peaks Ltd	Rule 23	Amend	Enable the use of a pasture buffer around fodder crop where the paddock is permanently fenced. Base the permitted activity rule on % of farm approach; % should be based on re-grassing rotation. Mapping of tile drains should only be required where they are known, similar to management plan requirements.
99.3	BUCKINGHAM Greta	Rule 23	Oppose	I believe a 10% of landholding limit would be a far better option to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a discussion with the land sustainability team around their intentions for the winter.
100.3	BUCKINGHAM Janette	Rule 23	Oppose	Replace with a farmer best practice system.
101.3	BUCKINGHAM Thomas	Rule 23	Oppose	I believe 10% of landholding limit would be a far better option to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a discussion with the land sustainability team around their intentions for the winter.
102.4	Burwood Station Ltd	Rule 23	Oppose	I am 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. I would only see a consent to be necessary in rare cases.
103.7	BYARS A R & L J Trust	Rule 23	Amend	Rule 23(a) Strip grazing of sheep should be allowable after 2018. Rule 23(b)(iii)&(iv), (vii): Reword to 25% or remove and 3m from edge irrespective of slope as is current ruling.
105.1	BYARS Jeremy	Rule 23	Oppose	I would like the rule to be changed so that 15% of a farm, or 50ha (whichever is greater) can be wintered on intensively.
107.4	BYARS Richard	Rule 23	Oppose	Area could be set on a percentage of landholding for larger properties.

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				Rule 23(b)(vi): Cannot see any benefit in mapping tile drains.
108.81	BYTHELL Jesse	Rule 23	Support	Retain.
109.2	C F L Farms Ltd	Rule 23	Oppose	Give incentives to farmers who are prepared to be self-sufficient and have no need to rely on the dairy sector for income. And look at initiating inside wintering systems for dairy farmers during winter. For a start this will make roads safer and cleaner.
111.1	C S Wilson Farming Ltd	Rule 23	Amend	Rule 23(b)(i) I strongly recommend a computer based program (via internet) be developed for farmers to create these Management Plans that once set up require very little time to change from your year (versus paper plans which can be lost and hard to read and time consuming). An example is Production Wise which has been created for grain farmers to manage their operations. This service could be provided free of charge. Rule 23(b)(iii): Amend the Rule so it reads no more than 20ha intensive winter grazing within the Old Maitaura Zone (not land holding) on the Land holding.
114.3	CALLAHAN Pamela	Rule 23	Oppose	Grass pastures run out in 10 years and we need to replant at least 10% of our land each year to keep the same level of production.
117.1	Campbells Block Ltd	Rule 23	Oppose	I think the 15% that was in the original document is a significant improvement rather than setting a hectare limit. Provide a suggested stocking rate.
118.7	Carmyllie Farm	Rule 23	Oppose	Farm management plans - what level of detail is appropriate? Should a nutrient budget be required for all farm types? Limit to areas for intensive winter grazing, currently 20 or 50ha limits. Should there be a percentage of landholding limit for larger farms? Should there be a % of intensive grazing usage of land on farm for your stock as required?
119.2	Carnie Farms	Rule 23	Support Oppose	Retain (b)(iv). Amend (b)(3) to 3 metres from the outer edge and remove slope.
120.3	CARTER D G & B J	Rule 23(b)(iv)	Oppose Amend	Rule 23(b)(iv). Move to a system which allows 15% intensive winter grazing of one landholding.
121.1	CARTER W J	Rule 23	Oppose	Should be based on a percentage of total land you own e.g. 30%.
123.4	Caughey Ltd	Rule 23	Oppose	I think it should be left the way it is in the current plan.
124.2	CHAMBERLAIN Terry	Rule 23	Oppose	Change rule to focus on actual zone being wintered on within the farm, rather than the riskiest zone applying to the whole farm.
125.1	CHARTRES Peter	Rule 23(b)(iii)(iv), (c), (d) and (e)	Oppose	Delete unreasonable limits on winter grazing areas i.e. 20ha/50ha limits. Retain three metre grazing rule. Provide additional resources to the Environment Southland land sustainability

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				team to continue the good work they are doing to engage with farmers directly. They are effectively promoting good practice through constructive engagement with landowners.
126.3	Cheviot Downs Ltd	Rule 23(b)(iv)	Amend	If a limit needs to be set, base it on land area. E.g. 5% would fit our particular farming practices (bedrock, riverine – oxidising classifications).
130.2	CHRISTIE Raymond	Rule 23	Amend	As opposed to a blanket area, each individual property be assessed on topography e.g. flat – rolling, open drains, tile drains or free draining.
131.1	CHRISTIE William	Rule 23	Amend	Each property should be assessed individually on topography, soil types, drainage types e.g. open, tile etc. contour e.g. flat, rolling.
132.1	CHURCH David	Rule 23	Amend	Change to a percentage instead of a restricted area.
133.4	Civil Tech Ltd	Rule 23	Amend	Rule 23(iii) and (iv): A percentage basis may be better or do you have a target total nutrient loss that you are trying to contain? They should be set at good crop rotation practice levels. Allow a longer transition to this point and model if there will be enough winter feed when enacted. Rule 23(vii)(1), (2) and (3): Alter the wording. Why not just measure from the top edge of the bank where the fence is or would be? As it is it would mean that waterways with high banks may push the crop to 20m when there is 3m of flat land that would meet the acceptable requirements.
134.1	CLARK B D & N J Trust	Rule 23	Oppose	The set amount of 20 or 50 ha currently proposed is changed to a percentage of land use as previously proposed.
135.4	CLARKE A W & T M Partnership	Rule 23	Amend	Remove grandparenting.
136.2	CLARKE Alanna	Rule 23	Oppose	Delete reference to 50ha area and replace with 20-25% of effective area. Delete Rule 23 (vi) and (vii) and replace with best practice in grazing areas near waterbodies and drains grazed last and left with high residuals.
139.5	CLARKE David	Rule 23	Oppose	Delete 50ha limit and amend limit to 20-25% of effective area. Base it on a percentage of total effective area on the farming enterprise. Delete Rule 23(vi) and (vii) and replace with best practice in grazing drains and areas next to waterbodies grazed last and left with high residuals.
141.3	CLARKE Julie Ann & TUCK Roger	Rule 23(b)(iv)	Amend	Include a consideration for landowners over a certain area to be a percentage of their landholding, not restricted to 20 or 50 hectare.
142.3	CLEARWATER G S & M	Rule 23(b)(ix)		In a 25-75mm rain event over 24-48 hours, storm water is often discoloured as it flows into

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	A			our first paddock containing sediment.
144.5	CLEARWATER Sue	Rule 23	Oppose	I oppose this rule in its entirety with reference to my rejections to the "physiographic" zoning and hectare amounts that are unrealistic when compared to the amounts needed for sustainable farming. The exception in this rule that I DO support is the management plan.
146.1	Clemcorp Ltd	Rule 23	Oppose	Limits set on intensive winter grazing – should be relative to the size of your farm.
147.6	CLEMENT Karina	Rule 23	Amend	(b)(vi) Amend to known drains, not all farmers currently know the drains on their property. (b)(vii) when walking along riverbed the slope varies. Measurements can be taken by 3 people - all results would be different. Outer edge of bed varies during the year/season. Actual river changes course. (b)(ix) Amend water flow from bush discolours waterways. How do we prevent in major rain/flood? Define the measurement for 'conspicuous'. How is this measured?
148.3	CLEMENT Paul & Linda	Rule 23(c)	Oppose	We would suggest that if it is necessary to restrict winter grazing it should be done on a percentage basis.
150.4	CLIFFORD Mervyn & Judy-Ann	Rule 23	Oppose	One hundred metre setback from lakes should not include duck ponds, winter grazing setbacks are too restrictive. ES consider farm size when calculating the number of hectares for winter grazing crops, consider percentage. Three metres up to 16 degrees, 10 metres over 16 degrees.
152.13	Clover Bell Ltd	Rule 23	Support in part	We would like to see two changes to this rule, firstly, remove the use of area as a reference and use a percentage of the farm as a suitable measure, we suggest 20% of the land area is a workable figure; secondly, this remains a permitted activity as long as it's conducted along the guidelines described in the DairyNZ booklet referred to above.
153.2	Coalbrook Partnership	Rule 23	Oppose	10 metres maximum setback.
154.3	Coastal Plains Ltd	Rule 23	Oppose	The wintering of a farm business' own stock should be a permitted activity. Avoidance of consenting process.
155.5	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 23	Oppose	Rule 23 b(iii) and 23(b)(iv) That intensively winter grazing a minimum of 20 to 50 ha unless area equates to less than 15% of property is a permitted activity ie large properties can intensively winter up to 15% of their land without a resource consent. Only require mapping of new/maintained/upgraded subsurface drains within intensive winter grazing areas. That resources, time & money are directed at engaging with farmers to set in place and implement their Farm Management Plans.

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156.8	COCKBURN Grant & Rachel	Rule 23	Amend	More clarification required on what the council considers when processing a restricted discretionary activity, in particular N loss limits. Amend clause 23(b)(ix) to accommodate “heavy rain event.”
157.5	COGHLAN K P & W A	Rule 23	Oppose	I am firmly opposed to compulsory management plans.
158.5	Colin Woodrow Ltd	Rule 23	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years. This would pick up issues on farms and create good working relationships, without hassles of compliance officers being involved.
159.4	COLLING Leigh	Rule 23	Oppose	Restrictions around cropping and the required buffer zones will have a dramatic effect on what I can do with the farm. This is not realistic and should be removed.
160.7	COLLING Megan	Rule 23	Oppose	Auditing should be done approx. 3 years apart not annually, clarify how rules will be enforced, extend time frames. If a farmer is currently farming sustainable and environmentally wintering stock they should be allowed to continue. Some large farms would required 50 HA just for themselves. Good riparian plant around creeks would be more beneficial than buffer zones. Rule 23 (c) - using the last 3 years for benchmark should be amended for new farm ownership. There should be rules on expected time frames to produce management plan and assistance required free of charge to help make these plans
161.5	COLLINS Gary	Rule 23	Oppose	We strongly recommend ES to encourage indoor wintering which requires winter crops to be cut and carried eliminating huge nitrate losses.
162.5	COLLINS Rachael	Rule 23	Oppose	We strongly recommend ES to encourage indoor wintering which requires winter crops to be cut and carried eliminating huge nitrate losses.
163.3	CONLAN Eddie & Judy Family Trust	Rule 23	Amend	Rule 23(b)(ii)&(iii): The area for cultivation should be related to the total farm size and number of stock to be wintered. Say maximum of 10-20% of the land area in any one year. 23(b)(vii): That the exclusion zones only apply to cultivated crop areas and those pasture areas used to winter large numbers of animals on small areas over in June and July. That only areas that drain directly into the waterways and streams need to have vegetation strips stock excluded over winter.
164.2	Conlan Farming	Rule 23(b)(iv)	Oppose	Should be a percentage of farm area eight to ten percent rather than a set area.
165.1	Cook Farming Co Ltd	Rule 23	Oppose	A percentage of the property would be a more even way to limit winter grazing areas. Have a limit on stocking rates to reduce environmental impacts.

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				Remove requirement for farm management plan.
168.2	COPLAND R D & N J Family Trust	Rule 23(b)(i) & (iv)	Amend	A percentage of holding size would be a more appropriate measure dependent on farm type. Say 20% for a self-contained dairy or sheep farm, 50% for w winter grazing operation.
172.16	COWAN Les & Christine	Rule 23	Amend	Delete.
173.3	COWIE Martin	Rule 23	Oppose	We do not want to have widths prescribed for vegetated strips. We want to make use of the natural contour vegetated strips on the farm, e.g. gullies and rolling hills. This is more practical and common sense and provides better shelter for animals.
175.4	CRACK Stephen	Rule 23	Oppose	Slope rule needs to be modified to allow for slopes that are nowhere near open waterways and at most 10-15 metres would be more than adequate.
176.4	Crayburn Farm Trust	Rule 23	Oppose	We oppose the farm environment plan because of the added cost (time, money and flexibility in our farming operation). We are now what is termed a small to medium sheep farm and like many in our position struggling to survive. This plan will only encourage the selling of such farms to large corporate businesses which can cope with these expensive costs ES are trying to impose with disregard to the economic viability of our business.  It is concerning that Environment Southland can 'exercise its discretion in the quality of, compliance with and auditing of the management plan'. This would give ES the power to regulate and prosecute farmers who don't comply with the farm management plan.  Delete 23(b)(vi)  Rule 23(b)(vii): Remove Appendix N 7 Cultivation map and resource consent needed for slopes greater than 20 degrees.
177.3	Cromel Valley Station Ltd	Rule 23	Amend	50ha is insufficient, a percentage of landholding i.e. 15% is more appropriate.
178.3	Crooks Dairy Ltd	Rule 23(c)	Oppose Amend	We would rather see this done on a percentage or stock unit bases which allows for different size farms and cuts out a lot of unnecessary consenting for both farmers and ES.
179.6	CROOKS Jonathan Ross & Sarah Jane	Rule 23		Rule 23(b)(vii): We suggest that the setback distance be a maximum of 10 metres for any slope or implement good management practices rather than regulated setback distances.  Rule 23(b)(iii) & (iv) We suggest the rule be changed to be based on a percentage of total land holding area rather than a maximum area. We think 15-20% of land holding area would be appropriate for this rule. Perhaps this rule should be based on <i>permanent</i> stock unit volumes stated for the property, with crop being permitted up to a maximum percentage area of crop per property.
181.13	CRUICKSHANK Peter &	Rule 23		Exclude sheep from setback requirement above 16 degrees in Rule 23(b)(vi)(3). Amend Rule

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	Liz			23(b)(vi) to accommodate small herd numbers.
182.1	Currie Farm Ltd	Rule 23	Oppose	Restrictions for the respective physiographic zones should be a percentage of the individual landholding. I would propose 10 and 15%.
183.4	CUTHBERTSON John	Rule 23	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.4	CUTHBERTSON Shane	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points
186.5	D R & J A E Pullar Ltd	Rule 23	Amend	Amend Rule 23 (b) (iii) & (iv) to change the land area approach to one of a percentage of total land area. For (b) (iii) replace the wording with not more than 5% of the landholding within the Old Mataura or Peat Wetlands physiographic is used for intensive winter grazing. And for (b) (iv) Replace the wording with not more than 10% for the landholding within the Riverine, Gleyed, Bedrock/Hill country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones contained in a landholding. Amend Rule 23(b)(vi) to require that the location of any outlet of sub-surface drains within the area of land used for intensive winter grazing is mapped and that this information is provided to Environment Southland upon request.
188.2	Dairy Farms NZ Ltd	Rule 23	Oppose Amend	Only map open drains and mark where possible tile drain outlets.
189.34	Dairy Holdings Ltd	Rule 23		Amend Rule 23(b)(iv) to refer to a percentage area – as land holding is relatively arbitrary – DHL suggests 50% of land area.  Amend Rule 23(b)(vi): the location of any <u>new or upgraded</u> sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;  Amend Rule 23(b)(vii):

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				<p>A vegetated strip is maintained, and stock excluded from, the outer edge of the bed of any river, wetland, modified watercourse or artificial watercourse <u>that is not already fenced as at 30 May 2016</u>, for a distance of:</p> <ol style="list-style-type: none"> <li>1. 3 metres from the outer edge of the bed on land with a slope of less than 4 degrees; and</li> <li>2. 10 metres from the outer edge of the bed on land with a slope between 4 degrees and 16 degrees; and</li> <li>3. 20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees;</li> </ol> <p>Amend Rule 23(b)(ix): overland flow of run-off water does not cause a conspicuous discolouration or sedimentation of any adjacent waterbody <u>beyond that naturally occurring as a result of heavy rainfall or flooding events</u>.</p> <p>Delete Rule 23(c)(i) and Amend Rule 23 matter of discretion (1) as follows:</p> <ol style="list-style-type: none"> <li>1. the quality of and compliance with and auditing of the Management Plan, <u>taking into account the costs associated with compliance monitoring and auditing and the desirability to prevent duplication of monitoring and auditing</u>;</li> </ol>
190.13	DairyNZ	Rule 23	Support in part Amend	<p>Clarify the linkages between Rule 23 and the definition of “landholding”. In addition, ES should clarify whether this definition includes support blocks and leased land.</p> <p>Amend (b)(vi) to:</p> <p>- the location of any <u>known or new</u> sub-surface tile drains within the area of land used for intensive winter grazing, and their outlet position and relative depth is mapped and provided to Environment Southland on request.</p> <p>Delete (b) (vii) and replace with:</p> <p><u>(vii) a vegetated strip is maintained, and stock excluded from, the outer edge of the bed of any river, wetland, modified watercourse or artificial watercourse for a distance of:</u></p> <ol style="list-style-type: none"> <li><u>(1) a minimum of 3 metres from the outer edge of the bed on land with a slope of less than 16 degrees; and</u></li> <li><u>(2) critical source areas are to be retained with a grass filter strip for their entire length</u></li> </ol>



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				<p><u>or a sediment retention system is installed, and maintained to prevent sediment discharge before the critical source area enters a natural waterway, drain or leaves the property, and</u></p> <p><u>(3) on slopes greater than 16 degrees, vegetated strips should be a minimum of 5 metres and;</u></p> <p><u>(4) critical source areas are to be retained with grass filter strips and a sediment retention system is installed and maintained to minimise sediment discharge before the critical source area enters a natural waterway, drain or leaves the property boundary.</u></p> <p><u>Amend Rule 23(b)(viii) to:</u> viii) The winter grazing does not occur within <del>100m</del> <u>3m</u> of the outer edge of a bed of any lake or the coastal Marine Area <u>if slope is less than 7 degrees</u></p> <p>Amend Rule 23(c)(i) to: 23c)(i) the area of land used on the landholding for intensive winter grazing has not increased beyond the area of land used, averaged over the previous <del>three</del> <u>four</u> years;</p>
191.10	DALE J M & K B	Rule 23	Oppose	<p>Details around yield and stocking rates should be considered. Intensive areas should be set as a percentage of total farm.</p> <p>Wording should allow for additional crop per holding to take into account multiple holdings.</p>
192.9	DALE P T & S B Trust	Rule 23	Amend	<p>Amend to focus on actual zone being wintered on within the farm, rather than riskiest zone applying to the whole farm. Allow dairy farms to be self-contained if they are able so they have the capability of wintering all their stock on farm and this is managed appropriately.</p> <p>We object to Environment Southland controlling farmers' ability to use only 15% of their land area for wintering on fodder beet crops. You would be better to promote and implement the above i.e. reasonable buffer zone, fencing of waterways etc. Remove fencing requirement in the hill country.</p>
194.4	Davie Justin	Rule 23	Oppose	<p>Far too much time and money to be spent annually. Better off with a simple plan farmers can do themselves with a compliance check every 5 years. Make it easy to update changes without the requirement to do it annually, essentially from square 1 again. No point limiting area that can be winter cropped. All animals have to winter somewhere so if you can't do it all at "farm A" they will be wintered elsewhere at "farm B C D E..." Also no differentiation between types of animals grazing particular crop. i.e. lambs on a light brassica crop is classed as the</p>

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				same as heavy cows on heavy fodder beet crop which practically represents different ends of the scale of "intensive" wintering and its implications.
195.4	DAVIE Stuart	Rule 23	Oppose	This should become a discretionary activity. 1. intensive grazing < 400 su/ha forage crops-beets and brassicas? 2. winter grazing 15 may to Aug 31 ? 3.40 ha or 15 % of land area 4.lake and coastal setback same as other water bodies 5. Drainage records only required for new / altered drainage work 6. b(ix) needs to be deleted.
196.3	DE BOER Frido	Rule 23		Delete and promote good environmental land use.
198.3	DIACK Hugh	Rule 23	Amend	Amend the rule to allow for 15% of the effective area of a landholding to be used for intensive winter grazing. Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope.
200.5	DICKIE Alton Brent	Rule 23	Oppose	Push out the date to 2025. Remove the condition relating to Farm management plans and replace with encourage. Amend (b) (iv) to the greater of 50 ha or 20% of the total property. Amend definition for Winter grazing to June to August. Remove rule (b) (viii) 2 & 3. Amend (b) (vii) to remove references to slope. Amend rule (b) (vi) to require mapping of any new or redeveloped drains only.
201.2	DICKSON Andrew	Rule 23	Oppose	The area allowed for winter grazing must be worked out by using a combination of farm type, size and capital stock numbers. A percentage of the farm would be then used as area set aside for winter grazing. Each farm would then have different areas available for wintering.
202.1	DICKSON Brent Gordon	Rule 23	Amend	23(b) (ii) & (iii) The limit of 20ha or 50ha needs to be considered against the land use.
203.1	DICKSON Bruce John	Rule 23	Amend	23 b(ii) & (iii) There needs to be a change which would allow areas greater than 20ha or 50ha depending on zone to be used for cultivated winter feed crops. Maybe a percentage of the total land or a percentage based physiographic zone size. b(viii) That the rules exclusion zones only applies to cultivated areas and those pastures paddocks used to feed high concentrations of animals for extended periods in June and July. If the rule is to be applied to all areas grazed May to September inclusive, then only the point discharge areas and swales need to be identified and fenced for stock exclusion.
204.5	DICKSON Grant	Rule 23	Oppose	Remove the condition requiring Farm management plans and replace with encourage. Amend (b)(iv) to the greater of 50ha or 20% of the total property

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				Amend definition for Winter grazing from June to August. Remove rule (b)(vii) 2 & 3. Amend (b) (vii) 1 to remove references to slope. Amend rule (b) (vi) to require mapping of any new or redeveloped drains only. Push out the date to 2025.
205.27	Dillon Ag Ltd (Chris Dillon)	Rule 23	Oppose	<ul style="list-style-type: none"> <li>Remove 'Landholding' from the plan and replace with 'Title'. Remove hectare limits.</li> <li>GMP in farming. GMP should include stock class. Cows should be wintered on heavy soils.</li> <li>Forage oats and regrowth crops should be left out of wintering.</li> </ul>
206.27	Dillon Ag Ltd (Rochelle Dillon)	Rule 23	Oppose	<ul style="list-style-type: none"> <li>Remove 'Landholding' from the plan and replace with 'Title'. Remove hectare limits.</li> <li>GMP in farming.</li> <li>GMP should include stock class. Cows should be wintered on heavy soils.</li> <li>Forage oats and regrowth crops should be left out of wintering.</li> </ul>
207.7	Dillon Grain Ltd	Rule 23	Oppose	Any limits imposed should be across the board. This would maintain an even economic playing field.
208.1	DILLON M J & S E	Rule 23	Oppose	<p>Rule 23(b)(iii) Amend 20ha limit to 35% of total farm area; Change limit to per farm not landholding; and Remove Old Matura from Rule 23(b)(iii) and treat as per Rule 23(b)(iv).</p> <p>Rule 23(b)(iv) Amend 50ha limit to 35% of total farm area; Change limit to per farm not landholding.</p> <p>Rule 23(b)(vi): Amend the location of any KNOWN, new or altered tiles.</p> <p>Delete Rule 23(c)(i).</p>
209.32	DIPROSE Dave	Rule 23	Support	<p>The location of any(known)sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;</p> <p>(1) 3 metres from the outer edge of the bed on land with a slope of less than 4 degrees; and (2) 10 metres from the outer edge of the bed on land with a slope between 4 and 16 degrees; and (3) 20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees.</p>

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210.85	Director-General of Conservation	Rule 23	Support in part	<p>Retain Rule 23 with the following amendments;</p> <p>(b) ...</p> <p>(ii) no intensive winter grazing to be undertaken in the alpine physiographic unit, or on <u>a marginal strip, a esplanade reserve or strip, or unformed road where they are adjacent to a river or lake bed</u></p> <p>(iii) not more than 20 hectares <u>or 10% of the land holding whichever is smaller</u> of intensive winter grazing is undertaken on a land holding within the Old Mataura or Peat Wetlands <u>or Bedrock/hill</u> country physiographic zones;</p> <p>(iv) no more than 50hectares <u>or 10% of the land holding whichever is smaller</u> of intensive winter grazing is undertaken on a land holding within the Riverine, Gleyed, <del>Bedrock/Hill Country</del>, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones;...</p> <p>(c)From 30 May 2018, the use of more than 20 hectares <u>or 10% of the land holding whichever is smaller</u> of a landholding for intensive winter grazing in the Old Mataura, or Peat Wetlands <u>or Bedrock/hill</u> physiographic zones or 50 hectares <u>or 10% of the land holding whichever is smaller</u> in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces physiographic zone is a restricted discretionary activity, provided the following conditions are met:</p>
211.3	DITCHFIELD Dylan	Rule 23	Oppose	<p>I would also recommend that the council consider a more appropriate method of determining areas for intensive winter grazing, taking in to consideration the scale and stocking rate farming operations and what it would normally take to intensively winter livestock on a self-contained type of unit.</p> <p>I would fully support a Management Plan taking the place of rule based issues on intensive grazing, to get a far more acceptable outcome for the environment, communities, economy, cultural aspects.</p> <p>I recommend the Physiographic mapping system be withdrawn from helping to determined policies and rules until validation. However I do not see an issue with using it as a guide and help formulate a Management Plan for farming operation.</p> <p>Delete rule stating maximum areas for farming operations to intensively winter graze of 20 or 50ha (depending on what zone you operate in).</p>
212.2	DODD N R & J L	Rule 23	Support Oppose	Propose leave it at 3 metres from outer edge, delete degrees from outer edge.
214.14	Donald Farm	Rule 23	Oppose	Rule 23(b)(iv): The area should be a percentage of the farm with a degree of flexibility based

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				<p>on facts such as topography, soil type, crops grown as outlined in a Management Plan. <u>Recommend</u> 20% - may need more depending on setbacks.</p> <p>Delete Rule 23(b)(ix)</p> <p>Oppose 23(b)(vi)</p> <p>Rule 23(b)vii: <u>Recommend</u> the proposed distances be guidelines. Consideration given in the management plan to things such as type of crop, stock class, way paddock is grazed, cultivated or direct drilled, riparian strip present or not.</p> <p>Rule 23(c)(i) <u>Recommend</u> removing the area requirement and move to a percentage of total farm.</p>
215.3	Dooley Partnership	Rule 23	Amend	Include sheep in buffer zone widths up to 10 metres, but exclude sheep from 20 metres. Keep 20 metres for cattle and deer.
216.3	Douglas Monymusk Farms Ltd	Rule 23	Oppose	Remove area restriction.
217.2	DRISCOLL Timothy & Jocelyn	Rule 23	Support	Retain (b)(iv).
218.2	Drumderg Farm & Melgan Ltd	Rule 23		<p>The 20 or 50 ha limit is not fair to larger farmers. Make it a percentage of the property. e.g.10 - 15 percent.</p> <p>It would be difficult to map all the tile drains within our property and winter grazing area as I don't know exactly where they all are. Perhaps only require us to map new drains would be a more feasible idea.</p> <p>Why is the grazing margin for a lake 100 metres? Why not have the same rules as for any other creek or stream.</p>
219.5	DRUMMOND R G & J M	Rule 23	Oppose	Believe 15% of total farm area for winter crops better option. But could make Rule that consent needed if area of winter crop greater than 15% or over say 50ha.
220.14	Drylands Farming Ltd	Rule 23	Oppose	Appendix N and all other appendices should remain unchanged for the time frame of the plan

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			Amend	<p>and until such time as the plan is revised.</p> <p>A percentage of 15% of land holding for wintering. Wintering on larger area if forage oats is used as it has the ability to be grazed in winter and regrow to capture nutrients in the spring before summer harvest.</p> <p>Only ends of tile drains should need to be known and mapped.</p> <p>23(c) currently worded that those with Old Mataura/Peat Wetlands and any other zone in their landholding can only use 20 hectares for intensive winter grazing.</p> <p>Needs a wording change including an additional 30 hectares on any other zone with the landholding.</p> <p>23(c)(i) Land used for intensive winter grazing should be an average over the previous 5 years as at 3 June 2016, as the plan is technically in effect now and we can't go over these allowable land areas for the next 2 years, meaning it becomes a 1 year average currently.</p>
221.14	DRYSDALE Family Trust	Rule 23	Oppose Amend	<p>Appendix N and all other appendices should remain unchanged for the time frame of the plan and until such time as the plan is revised.</p> <p>A percentage of 15% of land holding for wintering. Wintering on larger area if forage oats is used as it has the ability to be grazed in winter and regrow to capture nutrients in the spring before summer harvest.</p> <p>Only ends of tile drains should need to be known and mapped.</p> <p>23(c) currently worded that those with Old Mataura/Peat Wetlands and any other zone in their landholding can only use 20 hectares for intensive winter grazing. Needs a wording change including an additional 30 hectares on any other zone with the landholding.</p> <p>23(c)(i) Land used for intensive winter grazing should be an average over the previous 5 years as at 3 June 2016, as the plan is technically in effect now and we can't go over these allowable land areas for the next 2 years, meaning it becomes a 1 year average currently.</p>
222.2	DUFF Bradon	Rule 23	Oppose Amend	<p>I recommend 15% of landholding be cultivated and I recommend a 2 step rule, 3 metres from outer edge for less than 4 degrees and 10 metres for more than 4 degrees.</p>
224.8	DUFFY Paul	Rule 23		<p>Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils. The consent process needs to be straight forward, simple, not expensive for farmers and well explained.</p>
225.4	DUGDALE Peter	Rule 23	Oppose	<p>Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and</p>

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				cultural viewpoints.
227.2	DUNBAR M	Rule 23	Oppose	Winter grazing management cannot be fixed in a plan.
228.1	DUNCAN Murray & Andrea	Rule 23	Oppose	No specific decision requested.
229.4	DUNNAGE Tony	Rule 23	Oppose	Submitter seeks less consents.
233.8	DYSON Valerie & Glyn	Rule 23	Amend	Delete the maximum areas. Delete reference to physiographic zones. We agree that a management plan for intensive winter grazing should be included in the plan. We believe that it should exclude sheep and calves under 12 months old grazing on grass. Clearly define what intensive winter grazing is and what classes of livestock Rule 23 applies to
235.2	EADE G T & F A	Rule 23(c)	Oppose	The use of no more than 15% of landholding for intensive winter grazing in Riverine, Gleyed, Bedrock/Hill, Oxidising, Central Plains or Lignite-Marine Terraces is a permitted activity.
236.2	East Dome Farms Ltd	Rule 23	Oppose	Mapping Tile Drains – map only new/upgraded or maintained drains within winter grazing areas. Not all tile drains. As an alternative I propose <ul style="list-style-type: none"> <li>• Use the area based threshold for properties 300ha and under</li> <li>• For properties over 300ha the winter threshold could be 15% of the total area.</li> </ul> For properties that are exceeding 300ha of winter crop based on 15% of total area a consent process should then be required.
237.2	Eaton Willow Lodge (Brent Eaton)	Rule 23	Oppose	We propose this rule (23) needs changed to a percentage of 25 % (or similar) per farm (not landholding). Over that threshold would then require a resource consent and would capture those larger solely intensive winter grazing operations and not impose unnecessary additional consenting requirements to a self-sustaining farming unit, which will be regulated as to its winter grazing and cultivation through its individual compulsory management plan. Consent for 2018-Time frame unattainable. This needs to put on hold until the rules have been agreed by both ES and the farmers.
238.2	Eaton Willow Lodge (Derek Eaton)	Rule 23		We propose this rule needs changed to a percentage of 25% (or similar) per farm (not landholding). Over that threshold would then require a resource consent and would capture those larger solely intensive winter grazing operations and not impose unnecessary additional consenting requirements to a self-sustaining farming unit, which will be regulated as to its winter grazing and cultivation through its individual compulsory management plan. Consent for 2018 - time frame unattainable. This needs to put on hold until the rules have been agreed by both ES and the farmers.

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239.2	Eaton Willow Lodge (Paul & Elaine Eaton)	Rule 23		We propose this rule (23) needs changed to a percentage of 25%(or similar) per farm (not landholding). Over that threshold would then require a resource consent and would capture those larger solely intensive winter grazing operations and not impose unnecessary additional consenting requirements to a self-sustaining farming unit, which will be regulated as to its winter grazing and cultivation through its individual compulsory management plan. Consent for 2018 - time frame unattainable. This needs to put on hold until the rules have been agreed by both ES and the farmers.
240.2	EDIE Partnership	Rule 23(iv)	Oppose	Amend this rule so that farmers can put in enough crop to support the ha/or amount of stock they are wintering. The amount of intensive grazing should reflect the size of farm and number of stock units it is running.
243.4	ELS Luren	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
244.4	Elya Holdings Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares
245.3	Enfield Ltd	Rule 23	Oppose	Remove Rule 23(b)(vii) from plan. 23(b)(viii): Include lakes that are named/defined 23(c): Area should be a percentage of land owned. Up to 25% to allow for lower yielding crops that have less impact on ground. Or area allocated per stock unit on larger, more sparsely stocked properties e.g. 0.02 ha per stock unit.
246.4	ENGLISH Hamish	Rule 23		Defer land use rules until limit setting process.
247.10	Environment Southland	Rule 23	Amend	Delete Rule 23(b)(i) which requires a FEMP for intensive winter grazing as a permitted activity.  Amend 30 May to 1 May where it appears.  Delete Rule 23(b)(iii) and (iv), and replace with the following: <u>(iii) not more than 50ha of intensive winter grazing is undertaken on a landholding, with no more than 20 ha of winter grazing undertaken on land that is Peat Wetlands and Old Matura physiographic zones.</u>  Amend Rule 23(c) as follows:... the use of land for intensive winter grazing that does not



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				<p><del>meet condition (iii) of Rule 23(b) more than 20 hectares of a landholding for intensive winter grazing in the Old Mataura, or Peat Wetlands physiographic zones or 50 hectares in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite Marine Terraces physiographic zone is a restricted discretionary activity...</del></p> <p>Amend Rule 23 as follows: (viii) the winter grazing does not occur within 100m of the outer edge of the bed of <u>sensitive water bodies identified in Appendix O</u> <del>any lake</del> or the Coastal Marine Area; Include definitions as follows: <b><u>Bed of a wetland</u></b> the land within a wetland boundary. <b><u>Bed of a modified or artificial watercourse</u></b> the space of land which the waters of the watercourse cover at its fullest flow without overtopping its banks.</p>
248.1	Erne Hill Ltd	Rule 23	Oppose	<p>The steepest slope should be altered to a maximum of 35 degrees with no more than 25% of the area over 20 degrees. The setback should be measured on a graduated distance scale rather than all based on 20 metres. There still must be a more refined way to achieve the principle.</p> <p>In 50ha zone suggest a 50ha or 20% of the land area. Average Southland farm approximately 250ha there 50ha is 20%. (vi) amend to known location as in Appendix N.</p>
249.25	Ernslaw One Ltd	Rule 23	Support Amend	<p>Amend footnote 3 to Rule 23 to note that</p> <ul style="list-style-type: none"> <li>- distance is <u>measured horizontally</u>, not as slope distance, and be measured <u>back from the top of the bank of the bed of the river or stream</u>.</li> <li>- Add guidance by way of diagrams to show how slope should be measured.</li> </ul> <p>Refer to submission for produced for illustrating prescribed planting setback distances for the proposed Forestry NES.</p>
250.4	ESLER Lloyd	Rule 23	Support	Retain.
251.2	Euan Crump Farming Co Ltd	Rule 23(vi)	Amend	Just make for new sub-surface drains.
252.4	EVANS Blair	Rule 23	Amend	<p>Amend 23(vii) for clarity minimum 3 metres. Then 1 metre per degree i.e. 6 degrees would be 6 metres, 12 degrees=12 metres, 18 degrees = 18 metres. Maximum 20 metres.</p> <p>Clarify wording of 23(b)(iii) and (iv) i.e. if you have land across more than one zone then the following applies – No more than 50ha (but maximum of 20ha in each of these zones).</p>
253.4	EVANS Frederick & BROCKMAN Carla	Rule 23	Amend	Use an area based upon the threshold for each property. This is not a “one size fits all” issue. Map new/upgraded drains and all discovered drains within winter grazing areas, not all tile drains.

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254.3	EVANS Harold	Rule 23	Oppose	Allow winter grazing in peat wetlands physiographic zone.
257.3	EVANS O R & T D	Rule 23	Amend	The area should be a percentage of total hectares. Consent only triggered if additional stock brought in for winter grazing.
258.13	Eyre Creek Ltd	Rule 23	Oppose in part	It should be done as a percentage of your total area ie 30-40% would mean that existing winter grazing businesses are not compromised.  Rule 23(b)(iii) & (iv): Intensive winter grazing and dairy farming should not be targeted and should not be assessed independently to any other form of land use. Restrictions should be effects based and done on a case by case basis regardless of land use. This could be linked to water quality and nutrients typically leached (if any) proven with a scientific method similar but not limited to the Overseer model. Any restrictions should be applied once due diligence has been achieved such as a comprehensive cost benefit analysis of economic and social costs vs environmental benefits. If this exercise takes five or so years, then that is what we should do to get this regulation right the first time. In the interim adoption of best practice policies will go a lot further than the proposed regulation would in 'holding the line' of water quality.  23(c)(i) Grand parenting should be confined to those who are already performing an activity beyond any regulatory limits. Those beginning a new activity or wishing to increase an activity on a farm should be allowed the opportunity on a case by case effects based basis using relevant due diligence factoring in all environmental, economic and social perspectives.
259.10	F D Enterprises Ltd	Rule 23	Oppose	I propose a percentage based approach as per the draft copy of the PSWLP on the basis that it is a fairer measure and will be more reflective of each property, thus I propose 20 % threshold. I seek that Rules 23(b) – 23(f) apply from 30 May 2020.
260.1	Fairlight Station Ltd	Rule 23	Oppose	Change to allow winter grazing up to 15% of farm size.
261.4	Fairmount Perendale Stud Farm	Rule 23	Oppose Amend	Recognise the individual requirements of different farm/land sizes and what they need in order to provide substantial winter feed for their stock. A more workable solution/policy is necessary.
262.3	Fairview Eastern Bush Ltd	Rule 23	Oppose	The size of the farm should determine the amount of winter crop we can put in according to SU.
262.4	Fairview Eastern Bush Ltd	Rule 23	Oppose	The size of the farm in stock units should determine the amount of winter crop put in.

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263.1	Fallow Valley Ltd	Rule 23	Amend	Work on a realistic percentage of total property.
264.7	FarmRight Ltd	Rule 23	Oppose	Amend the set limits for cropping to a percentage based approach as per the draft copy of the PSWLP thus we propose 20% threshold. Amend the cropping limit to be set per farm (i.e. dairy shed) not landholding or farming businesses have the ability to provide information showing that landholdings are multiple farms.
265.86	Federated Farmers of NZ (Southland Province)	Rule 23	Oppose	<p>Amend as follows:</p> <p>(a) Until 30 May 2018, the use of land for intensive winter grazing is a permitted activity.</p> <p>(b) From 30 May 2018, the use of land for intensive winter grazing is a permitted activity, provided the following conditions are met:</p> <p>(i) a Management Plan is prepared and implemented in accordance with Appendix N, <del>including the mitigations relevant to the farming type being undertaken and relevant physiographic zone,</del> and provided to Environment Southland upon request, <del>or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants;</del></p> <p>(ii) no intensive winter grazing is undertaken <del>in the Alpine physiographic zone above 800m;</del></p> <p>(iii) <del>not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the Old Maitava, or Peat Wetlands physiographic zones;</del> <u>intensive winter grazing is undertaken in accordance with good management practices, including:</u></p> <p><u>(1) stock are fed progressively towards waterways;</u></p> <p><u>(2) slopes are grazed from top to bottom;</u></p> <p><u>(3) stock are back-fenced; and</u></p> <p><u>(2) critical source areas are fenced off and fed last.</u></p> <p><del>(iv) not more than 50 hectares of intensive winter grazing is undertaken on a landholding within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones;</del></p> <p><del>(v) the area of land used for intensive winter grazing is recorded for each year and provided to Environment Southland on request;</del></p> <p><del>(vi) the location of any sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;</del></p> <p>(vii) a vegetated strip is maintained, and stock excluded from, the outer edge of the bed of any river, wetland, modified watercourse or artificial watercourse for a distance of:</p> <p>(1) 3 metres from the outer edge of the bed on land with a slope of less than <del>48</del> degrees; and</p>

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				<p><del>(2) 10 metres from the outer edge of the bed on land with a slope between 4 and 16 degrees; and on slopes above 8 degrees set-backs will be worked out as follows (slope minus 5m), i.e. if the slope is 15 degrees, the set-back will be 10m.</del></p> <p><del>(3) 20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees; and</del></p> <p><del>(viii) the winter grazing does not occur within 400 20m of the outer edge of the bed of any a lake specified in Appendix Q or the Coastal Marine Area;</del></p> <p><del>(ix) overland flow of run-off water does not cause a conspicuous discolouration or sedimentation of any adjacent waterbody.</del></p> <p><del>(c) From 30 May 2018, the use of more than 20 hectares of a landholding for intensive winter grazing in the Old Maitara, or Peat Wetlands physiographic zones or 50 hectares in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces physiographic zone is a restricted discretionary activity, provided the following conditions are met:</del></p> <p><del>(i) the area of land used on the landholding for intensive winter grazing has not increased beyond the area of land used, averaged over the previous three years;</del></p> <p><del>(ii) conditions (v) to (ix) of Rule 23(b) are met; and</del></p> <p><del>(iii) a Management Plan has been prepared in accordance with Appendix N;</del></p> <p><u>(c) intensive winter grazing that does not comply with the rules in 23(a) and (b) is a restricted discretionary activity.</u></p> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. the quality of, compliance with and auditing of the Management Plan;</li> <li>2. the proposed management practices to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</li> <li>3. the quantum of and timing of any reductions in the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</li> <li>4. the potential benefits of the activity to the applicant, the community and the environment;</li> <li>5. the potential effects of the land use on surface and groundwater quality and sources of drinking-water.</li> </ol> <p>An application for resource consent under Rule 23(c) will be processed and considered without public or limited notification unless the applicant requests notification or</p>

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				<p>Environment Southland considers special circumstances exist that warrant notification of the application.</p> <p><del>(d) From 30 May 2018, the use of land for intensive winter grazing in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones that does not meet condition (i), or (v) to (ix) of Rule 23(b) or condition (i) to (iii) of Rule 23(e) is a discretionary activity.</del></p> <p><del>(e) From 30 May 2018, the use of land for intensive winter grazing in the Old Maitaia or Peat Wetlands physiographic zones that does not meet conditions (i) to (iii) of Rule 23(e) is a non-complying activity.</del></p> <p>(f) From 30 May 2018 and despite any other rule, the use of land for intensive winter grazing <del>within the Alpine physiographic zone</del> <u>above 800m</u> is a prohibited activity.</p> <p>(g) Despite Rule 23(a) to (f) the use of land for intensive winter grazing is a restricted discretionary activity, provided the following conditions are met:</p> <p>(i) the activity occurs on those parcels of land wholly contained with Computer Freehold Registers SL134/119, 307310, 307311, SL198/159, and SL151/191; and Lot 5 DP 376415 as contained in Computer Freehold Register 307305, and Lots 6 and 7 DP 376415 and Part Lot 8 DP 376415 as contained in Computer Freehold Register 307307;</p> <p>(ii) the primary purpose of the activity is to contribute to publicly available research on the mitigation of environmental effects of dairy farming or wintering;</p> <p>(iii) a Management Plan is prepared and implemented in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland.</p> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. the quality of and compliance with and auditing of the Management Plan;</li> <li>2. the proposed research to be undertaken and associated environmental effects, including methods and timing of publication.</li> <li>3. monitoring and reporting</li> <li>4. the proposed management practices to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</li> <li>5. the potential benefits of the activity to the community and the environment.</li> </ol>
266.5	Fenham Downs Ltd	Rule 23	Oppose	I think crop area should be done on a percentage of land owned.
269.1	Fernview Family Trust	Rule 23	Oppose	Rule 23(b)(iv): Determination of land used for winter crop be lodged on a digital map

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			Amend	<p>containing mitigation factors for any surface runoff. The total land area used for winter grazing must not be greater than 40% of the land holding of all adjoining properties owned by the same entity.</p> <p>Rule 23(b)(v): The use of digital technology will allow for a greater automation of area calculation and decrease the need for more monitoring staff reading through endless management plans.</p> <p>Rule 23(b)(vii): The fencing of all water courses be designed to ensure stock cannot cause any erosion to occur in the watercourse.</p>
273.1	Flaxwood South	Rule 23	Oppose	Strike out the rule and replace with good management practise guidelines and nutrient budgets.
274.2	FLECK W S & K M	Rule 23	Amend	<p>Intensive wintering needs to include all animals such as sheep, beef, deer as well as dairy. If a farm has a small area of Peat Wetlands or Old Mataura, then this shouldn't put it in the discretionary area where resource consent is required.</p> <p>The wording needs to be altered to allow continued use of suitable land.</p>
275.2	FLETT Alan	Rule 23	Oppose Amend	Distances should be 3m up to 10 degrees, 10m up to 25 degrees and 15m over that going by experience and no more than 5m around duck ponds and should be done as best practice not legislated.
276.1	FLETT Robert	Rule 23		Make requiring a consent at council's discretion to retain flexibility.
277.47	Fonterra Co-operative Group Ltd	Rule 23	Oppose in part	<p>Review the approach to limiting the extent of winter grazing (in (b)(iii) and (b)(iv)) so that it more clearly reflects potential risk to water quality.</p> <p>Delete conditions (b) (iii) and (iv) and replace with a new provision that reads:  <u>“Not more than 50 hectares of intensive winter grazing is undertaken on any landholding, except that no more than 20 hectares of intensive winter grazing shall be undertaken per landholding on land within the Old Mataura or Peat Wetlands physiographic zones.”</u></p> <p>Amend Rule 23 (b)(vi) to refer to “..any <u>known</u> sub-surface drains ...”</p> <p>Amend Rule 23 (b)(vii) to require a 3 metre setback on slopes of less than 4 degrees, and above 4 degrees a 1 metre setback for every degree of slope up to 16 degrees.</p>

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				Amend Footnote 3 as follows: “is the average slope from the <del>outer edge of the bed</del> top of the bank of the water body to a point 20 metres from the <del>outer edge of the bed</del> top of the bank of the water body.”
278.1	FORDYCE Gary	Rule 23	Amend	Better definition of stock class e.g. Sheep – lambs, ewes; Cattle – cows, calves in Intensive Winter Grazing Rule.
279.69	Forest & Bird NZ	Rule 23	Oppose	<p>Amend Rule 23 as follows:</p> <p>ii) no intensive winter grazing is undertaken in the Alpine <del>or Peat Wetlands</del> physiographic zone;</p> <p>(iii) Not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the Old Maitaura, <del>Riverine, Oxidising or Peat Wetlands</del> physiographic zones;</p> <p>(iv) Not more than 50 hectares of intensive winter grazing is undertaken on a landholding within the <del>Riverine</del>, Gleyed, Bedrock / Hill Country, <del>Oxidising</del>, Central Plains, or Lignite-Marine Terraces physiographic zones;</p> <p>(vii) A vegetated strip is maintained, and stock excluded from the outer edge of the bed of any, river, wetland, modified watercourse or artificial watercourse for a distance of:</p> <ol style="list-style-type: none"> <li>(1) <del>3</del> 5 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope of less than 4 degrees (<del>flat</del>) or 10m <u>measured horizontally from the outer bed of a natural wetland or watercourse with native fish spawning habitat on land with a slope of less than 4 degrees (flat)</u>; and</li> <li>(2) 10 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope between 4 and 16 degrees (<del>rolling</del>); and</li> <li>(3) 20 metres <u>measured horizontally</u> from the outer edge of the bed on land with a slope greater than 16 degrees; and</li> </ol> <p>(viii) The winter grazing does not occur within 100m of the outer edge of the bed of any lake or the Coastal Marine Area, <u>including coastal lagoons and estuaries</u>;</p> <p>(ix) Overland flow of run-off water does not cause a conspicuous <del>discolouration</del> <u>change in visual clarity, or, any significant adverse effects on aquatic life or</u> sedimentation of any adjacent waterbody or <u>the Coastal Marine Area, including coastal lagoons and estuaries</u>;</p> <p>Amend Rule 23(c)</p> <p>(c) From 30 May 2018, the use of more than 20 hectares of a landholding for intensive grazing in the <del>Riverine, Oxidising</del>, Old Maitaura, or Peat Wetlands physiographic zones or 50 hectares in the <del>Riverine</del>, Gleyed, Bedrock / Hill Country, <del>Oxidising</del>, Central Plains or Lignite-Marine</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Terraces physiographic zone is a restricted discretionary activity, provided the following matters are met . . .</p> <p><b><i>Environment Southland will restrict the exercise of its discretion to the following matters:</i></b></p> <p>2. The proposed Management practices to <del>minimise</del> <u>avoid, remedy or mitigate</u> the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</p> <p>4. The potential <u>and negative</u> benefits of the activity to the applicant, the community and the environment, <u>including the sensitivity of the receiving environment;</u></p> <p>Add</p> <p>6. <u>The freshwater objectives and limits, and whether the water bodies affected are under allocated or over allocated, timeframe for achieving targets where over-allocated.</u></p> <p>Amend Rule 23(d)</p> <p>“(d) From 30 May 2018, the use of land for intensive winter grazing in the <del>Riverine, Gleyed, Bedrock / Hill Country, Oxidising,</del> Central Plains or Lignite-Marine Terraces physiographic zones that do not meet condition (i), or (v) to (ix) of Rule 23(b) or condition (i) to (iii) of Rule 23(c) is a discretionary activity.”</p> <p>Amend Rule 23(e)</p> <p>“(e) From 30 May 2018, the use of land for intensive winter grazing in the <del>Riverine, Oxidising,</del> Old Matura or Peat Wetlands physiographic zones that do not meet conditions (i) to (iii) of Rule 23(c) is a non-complying activity.</p> <p><b><i>Environment Southland will restrict the exercise of its discretion to the following matters: ....</i></b></p> <p>4. The proposed Management practices to <del>minimise</del> <u>avoid, remedy or mitigate</u> the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</p> <p>5. The potential <u>and negative</u> benefits of the activity to the community and the environment, <u>including the sensitivity of the receiving environment;</u></p> <p>6. <u>The freshwater objectives and limits, and whether the water bodies affected are under allocated or over allocated, timeframe for achieving targets where over-allocated.</u></p>
281.1	Four Legged Farming Ltd	Rule 23	Amend	Rule 23 (b)(ii) & (iii): The area for cultivation for winter crops should be a percentage of the



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				areas in the relevant zones. Say 8-12% in each.
282.1	Foveaux Investments (2008) Ltd	Rule 23	Oppose	Winter grazing to continue as a permitted activity with the current guidelines e.g. buffer zones etc.
283.4	Foveaux Investments Ltd	Rule 23	Oppose	Delete.
284.2	FRASER Alan	Rule 23	Amend	To clearly state that 'Intensive Grazing' in Rule 23, refers only to grazing of fodder crops i.e. swedes & turnips, chou & kale, fodder beet.
286.3	Frew Farming Ltd	Rule 23(iv)	Oppose	Take it back to the 15% rule, which is a recognised amount in regards to a general regrassing programme.
287.3	FREW Mervyn	Rule 23	Oppose	We would consider up to 10% for our winter crops should be allowed which is the same percentage as the remaining farming areas of Southland. Under this regime the requirement for gaining Consent would not be needed under our normal farming practice.
290.2	G A Young & Co Ltd	Rule 23	Oppose	ES needs to look at other mechanisms to control intensive winter grazing. Going back to a percentage of a landholding is probably the best option, but it could incorporate perhaps other aspects if it is not complicated. To have a rule of 50 ha's of winter crop for a large number of more extensive Southland S and B properties is stupidity in the extreme, and totally unnecessary to have to apply for consent to grow what is required for wintering their own stock.
291.4	G J Gardner	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
292.15	G S & M A Clearwater Ltd	Rule 23	Oppose	<p>I am not sure if 50 hectares of intensive winter grazing are appropriate. In my opinion a better environmental option would be to make it a percentage of total land area of particular titles.</p> <p>Retain Rule 23(b)(vii) but I don't support 10-20m setbacks as this significantly reduces the grazeable area.</p> <p>Rule 23(b)(ix) should take into account that in a significant wet weather event discoloration in waterbodies happens regardless of the intensive winter grazing. In regard to winter grazing I believe that there needs to be a distinction between different livestock classes e.g. sheep, yearling cattle, mature cattle as each class has a different environmental risk, due to their live weight differences. Weight of animals is important because large animals compact soil</p>

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				encouraging overland flow in wet weather.
294.3	Gardyne Agriculture Ltd (Duncan Gardyne)	Rule 23	Oppose Amend	Oppose capping land allocation to 50 hectares as limits amount of grazing options and income. Oppose mapping of subsurface drains as near impossible as geography of land changes. What's wrong with the 3 metre rule if land gradient is less than 8 degrees leading up to water edge? If 'lake' isn't running into waterways what is the issue?
296.6	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 23		The 20 and 50 ha's mentioned in (b)(iii) and (iv) be allowed to be greater on larger properties. Rule 23(b)(viii)(2) &(iii) That three metres width be the only buffer zone.
297.10	GARDYNE Hugh & Kathie	Rule 23		23(b) (vii) (1) - change to 5 metres. 23(b)(vii) (2) - change to 10 metres but slope range 5 – 30 degrees. 23(b)(vii) (3) - change to 20 metres but slope range over 30 degrees.  Remove 20Ha and 50Ha limits and introduce new limits that relate to property size, or other property activities, or length of rotations, or rainfall zones, or fertiliser applications, or anything
298.5	GARDYNE Joanne	Rule 23	Oppose	Physiographic zones stay outside plan. (b) (iii and iv) intensive wintering grazing is a permitted activity for 50ha or 15% of total farm area, whichever is greater. (b) (vi) remove from plan (b) (vii) setback of 3 metres up to a slope of 16 degrees, for slopes greater than 16 degrees use equation of degrees less 5 to equal setback. (b) (viii) same setback as in (b) (vii).What constitutes a lake needs to be clearly defined in plan glossary. (b) (ix) remove from plan.
299.16	GARDYNE John	Rule 23	Oppose	40ha or 15% of farmed area may be a better idea than using zones. 100su/ha+ = intensive. Forage crops =kale swedes, turnips, beet. Drainage mapping not needed. Setback 3m till 10 degrees then degree less 5 for steeper grades. Setback for lakes 10m for named lakes. Setback for coast same as water ways. Physiographic zones outside plan.

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300.16	GARDYNE Jonathan	Rule 23	Oppose	Should the percentage of land be a factor of the area of land wintered? If a larger property then they will need over 50ha of winter crop just to winter their own capital stock. Mapping of subsurface drainage is impossible; some of those drains could be 50 years old. The setbacks should be 3 metres as this is what waterways are and have been fenced off at. We cannot control the rain, even less so the timing and intensity, how are we supposed to control our surface runoff?
301.2	GARDYNE Lois	Rule 23	Oppose	Rule 23(b)(iv)Area for winter grazing should be the greater of 50ha or 25% of the total area of farm. Rule 23 (b)(vii)For any slope up to 16 degrees, setback is three metres. Above 16 degrees the formula of (slope degrees – 5) is used to determine setback. Remove clause (b)(xi) from plan.
302.1	GARDYNE Neil	Rule 23	Amend	Allow cereal cropping farmers to plant a cover crop after a cereal crop is harvested to be grazed similar to pasture in winter and spring. This cover crop area should not be included in any brassica area limitations.
303.1	Garfield Farm Ltd	Rule 23	Oppose	Require a different decision on farm size, farm classes, percentage of ground in crop to total hectares or work on stock unit to percentage total hectares.
304.2	Gavenwood Farm	Rule 23 (ix)	Amend	Amend to read: “all practicable measures are to be taken to minimise any overland flow of run-off water that causes conspicuous discolouration or sedimentation of any adjacent waterbody”.
305.1	GERRARD L J & J A	Rule 23	Amend	Amend Rules 23 and 25 to read “within a distance of 3/10/20 metres from the annual fullest flow or level.
308.1	GILKISON Nigel	Rule 23		The amount of winter grazing be on a percentage basis with the size of the farm, say 15 percent.
310.2	GILL Greg & Liz	Rule 23	Neutral	We think a percentage is better. 15% is too little but with a good long term regressing programme then we feel this could be increased to 20%. More clarification is needed around this for example, is this effective land or whole farm.
312.4	GILLESPIE David	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural viewpoints
313.5	GILLESPIE Maria	Rule 23	Support in part	Clarification needs to be given about how this Rule 23(b) is to apply in practise. That where

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			Amend	other mitigation measures have been taken, such as the placing of straw or other filtering material that the margin of 10m be reduced, as long as no sediment is reaching waterways. That a common sense approach prevail rather completely prescriptive.
314.4	Gladvale Farms Ltd	Rule 23	Oppose	Amend Rule 23(b)(iii) to exclude Peat Wetlands.  Exclude Rule 23(b)(iv)  Amend Rule 23(b) (vi) and (vii) to adjust distance to 3 metres no matter what the slope is and then grazed before sowing out in grass after August.  Delete Rule 23(b)(ix).  Amend Rule 23(c)(i) to be able to apply for extra if farming practice changes.  Amend 23(c) discretion matter (1) to competent staff to look at record and work with farmers.
315.1	Glen Echo Station Partnership	Rule 23(b)(iv)	Oppose	Intensive winter grazing be defined and restricted to a percentage of land area. We would be happy with ten percent of our land area.
316.3	Glenaffric Partnership	Rule 23	Oppose	Have a personalised plan for our property that reflects the environmental lay of the land but also allows best animal husbandry.
317.1	Glenaray Station (W Pinckney Ltd)	Rule 23(b)(iv)	Amend	Restriction to be 10% of land area.
318.4	Glenarlea Farms Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares. The plan currently reads like a 50 hectare farm can intensively winter on 100% of the property and a 1000 hectare farm can intensively winter on only 5%.
319.14	Glendhu Dairies Ltd	Rule 23	Oppose in part	Amend hectares to percentage of farm title area.
320.4	Gleneden Dairies Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares. The plan currently reads like a 50 hectare farm can intensively winter on 100% of the property and a 1000 hectare farm can intensively winter on only 5%.
322.9	Glenlapa Station	Rule 23b(i) and (ii), b (iii)(iv),	Support	Revert to the previously agreed percentage approach. Our expectation would be for this percentage to be no greater than 20% and always in conjunction with FMP and our LSO. We

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		b(v), b(vi), b(vii)	Oppose	suggest that this information would already be with our LSO. We feel the following formula is more practical whilst achieving a satisfactory outcome: 0-8 degrees = 3 metres >8 degrees = slope minus 5 metres Maximum = 10 metres
323.2	Glenshe Trust	Rule 23	Amend	Ensure consenting timeframe is workable. Change setbacks to 3m on slopes up to 16° and 10m on slopes over 16°. Remove 20 or 50ha limit and change to 30%.
324.1	Glentui Farms Ltd	Rule 23	Oppose	Restrictions on winter grazing should be per property, as part of FMP and best practice ticked off by Land Sustainability team. Alternatively, 50 ha for the first 200ha and 20% of total landholding.
325.1	GLOVER A F & C M Family Trust	Rule 23(b)(iv)	Oppose	Amend so restrictions are on a percentage basis.
326.1	GLYNN Chris & Dawn	Rule 23	Amend	We believe this needs to be looked into further and amended.
331.9	GRANT J J & J L	Rule 23	Oppose	Delete total ha requirement and replace with a percentage of total land area.
332.2	GRANT Robert	Rule 23	Oppose	The limit should be a percentage of land for your own stock. If you graze outside stock the rate should apply as the 20ha and 50ha limit.
333.2	Greenbush Farms Ltd	Rule 23	Oppose	Needs to be a percentage of land, not area of land for winter grazing e.g. 100 ha – 20% winter grazing, 500ha – 20% winter grazing.
334.3	Greenvale Station Ltd	Rule 23	Amend	Grandfather rights should apply without a consent e.g. the previous three years' average should be automatic. Fifty hectares are too much for some smaller properties but on a large scale property as ours, this is not enough in order to sustain viability. A maximum of 20 percent of a property should apply on a yearly basis to allow for a five year crop rotation. Only crops planted specifically for winter grazing should be included i.e. kale, not normal crops like oats, wheat and barley.
335.4	GREER Robin	Rule 23(c)	Oppose	If it has to be restricted then it needs to be calculated as a percentage of the landholding.
336.4	GRIMM Hamish	Rule 23		May – September moratorium on grazing should be a guide only with some formal discussion with FF to decide any variation in the actual dates. Sheep should not be excluded from winter grazing situations.
337.14	Growplan Ltd	Rule 23		Three width controls are better than one but this is still a very blunt instrument and one

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				which I fear will have little real effect except removing valuable land from production. What is needed is the ability to choose between this approach and a site-specific solution. For instance lidar/surface scan to enable site-specific setback design tailored to soil, climate and crop/s. This process does exist as a number of methods; some fully manual, on-the-ground methods based on simple proven rules-of-thumb through to various levels of GIS approaches which are semi-automated.
339.10	GUNN Olivia	Rule 23	Oppose	We recommend that Rule 23 is revised and any reference to any area is removed. We support management plans in accordance with appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for B (ix) to allow for adverse weather events.
340.2	Gunton Farms Ltd (Mark Gunton)	Rule 23	Oppose	No specific decision requested.
341.9	Gunton Farms Ltd (Jeremy Gunton)	Rule 23	Oppose in part	Intensive winter crop areas over 15% of land holding should be discretionary activity.  Retain 23(c).  Amend 23(f) From 30 May 2018 intensive winter grazing in the 'Alpine Zone' should be a discretionary activity.
343.2	Halder Oreti	Rule 23	Oppose	A major revision is required.
344.5	Hall Ag Ltd (Glenda Hall)	Rule 23	Oppose Amend	Delete mapping of subsurface drains. Need to define what a forage crop currently includes, should be defined as brassicas and beets only, need to exclude cereals and grass. Delete 50 ha cap. Area of lake needs to be defined as 100 ha or greater, amend to 3 metre rule if land gradient is less than 8 degrees leading up to water edge.
345.5	Hall Ag Ltd (John Hall)	Rule	Oppose	Delete mapping of subsurface drains. Need to define what a forage crop currently includes, should be defined as brassicas and beets only, need to exclude cereals and grass. Delete 50 ha cap. Area of lake needs to be defined as 100 ha or greater, amend to 3 metre rule if land gradient is less than 8 degrees leading up to water edge.
349.1	HAMILTON N J & R H & Manapouri Station	Rule 23	Oppose	No specific decision requested.
350.1	HAMILTON Nick	Rule 23	Oppose	Instead of a blanket 50ha a property rule, a sensible proportion of each property to go into crop would be better. For farmers using brassicas this needs to be at least 10%. Brassicas yield lower than fodder beet therefore more area is needed.

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351.3	HAMILTON Rosemary	Rule 23	Oppose	Use a percentage – 20% could work. Each separate landholding as long as it is on a separate title and is separated by either a road or another property should be treated as a different entity for winter grazing.
352.4	HAMMOND Emma & Peter	Rule 23	Support Oppose	Revert to the previous percentage of landholding requirement.
353.1	Hardwick Farm	Rule 23(b)(iv)	Oppose	The limit should be on a percentage basis 15-20% per farm per year.
354.3	HARPUR George	Rule 23	Oppose	No specific decision requested.
355.10	HARRIS David	Rule 23	Amend	Add clause regarding the discharge from tile drain not having an adverse effect on water quality it is discharged into.
358.14	HASTIE Stephen	Rule 23	Oppose	A percentage model based on the size of the farm and area of grazing, would be a far greater way of determining the area of land allocated for grazing. Not a magical number of 50 hectares. ES should be there to assist and benefit farmers, not limiting their farming practices.
360.1	Hazeldean Downs Ltd	Rule 23	Oppose	Duck ponds are excluded from Rule 23. Amend Rule 23 to allow a 10% area of the whole farm area for good quality winter pasture to be sown.
361.11	HBG AgriLimited	Rule 23	Oppose	Amend Rule 23 to include both a percentage and an area threshold, such as 15% of the land holding or the 20ha/50ha for the specific zones, whichever is bigger. Delete (b)(viii). Amend to include an exception added for Rule 23(b)(ix) to allow for adverse weather events.
362.6	Hedgehope Grazing Ltd	Rule 23	Oppose in part	Change the rule so that “up to 20ha of wintering on the Peat wetlands area, and up to 50ha per land holding”.  Amend 23(b)(vii): “Three metre vegetated strip for all wintering” and all critical source areas are protected to minimise sediment loss.  Amend 23(c) to define ‘previous 3 years’.
365.5	HEENAN M D and D W	Rule 23	Oppose	Amend the rule to either an overall percentage of the landholding, or permit either the 20 hectares or 50 hectares up to a certain size of property such as 200 hectares. Then above 200 hectares allow a further percentage of up to 25-30 percent to be used for intensive winter grazing as a permitted activity. This would recognize larger properties e.g. 600 hectares plus. Delete Rule 23(b)(vii)(3) requirements for a 20 metre setback, and instead have a 10 metre setback from the bed where there is a greater than 16 degree slope. Amend rule to exclude

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				ponds, and add an additional definition to define what is meant by a pond for clarity. Amend the rule to facilitate new ownership without requiring consent.
366.1	HEGAN M J & J M	Rule 23	Oppose Amend	Remove the limits on winter cropping.
367.1	HEISS Raphael	Rule 23(viii)	Oppose	Reduce to 20m in grass strip when in winter crop. <sup>7</sup>
368.3	HENDERSON Chris (Mrs)	Rule 23		As well as suitable shelter belts thought needs to be given to ‘sacrifice’ areas for all animals. Winter grazing strips of grass or forage greens. There is no more desolate sight than animals forced to spend the winter months on mud strips bereft of shelter or basic comfort. It is only a matter of time before strip-grazing under these conditions attracts wider scrutiny from those concerned with animal welfare.  Strip grazing also concentrates urine patches during the most critical months for nitrogen loss to aquifers and waterways. A pattern of winter feeding which avoids contamination and improves stock health merits wide consultation in the near future.
369.14	HENDERSON Michael	Rule 23	Amend	Needs to be changed to a % of farm title area, with science behind the % chosen.
370.3	HENDERSON Stephen	Rule 23(b)(iii)	Oppose in part	Rule 23(b)(iii): Under best practice, wintering on peat wetland is a permitted activity. Change from “ha” to “percentage” based or allow selling/trading of ha credits from property to property. Undertake a financial impact study on effects. Retain 23(b)(vii)(1)
371.6	HENDERSON Tracy	Rule 23	Oppose	Take out the not more than 20ha of intensive grazing within Old Maitaura and peat lands physiographic zones. Instead put in stipulations such as buffer zone around paddock, graze from other side of paddock first, towards creek last, back fence etc. Urban companies should have records and stipulation of what goes down the drain and testing by Environment Southland just like rural areas.
373.1	HICKMAN J J & T A Family Trust	Rule 23	Oppose	Amend to delete 50ha limit and replace with an area based on the stocking units owned by the farming entity.
374.1	High Country Farms Ltd	Rule 23	Amend	A 3 yearly plan would be adequate and if changes to the plan were to be made, it would then need to be re-submitted.
375.3	Hillview Trust	Rule 23 (b)(iv)	Oppose in part	Amend Rule 23 (b)(iv) to read as follows: “not more than 50 hectares of intensive winter grazing is undertaken on a <u>landholding farm</u> within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones;”



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377.3	HODGE Lynda	Rule 23	Oppose	I would like to see Environment Southland use a percentage for landholding not a Hectare rate. Example: 15% of total landholdings for any Old Maitaura and Peat Soils and 25-35% for all other soil types within the Southland area.
378.3	HODGE Murray	Rule 23	Oppose	I would like to see Environment Southland use a percentage for landholding not a hectare rate. Example: 15% of total landholdings for any Old Maitaura and Peat Soils and 25-35% for all other soil types within the Southland Area.
380.1	HODSELL Sam	Rule 23	Amend	The rule limiting each landholding to a max of 50ha winter grazing has been poorly set and farms should not be limited to a set area. Farmers that are following best practice should not be limited to a set area.
381.21	HOLDER Wendy & Tom	Rule 23		Remove Rules that support existing and proposed farm management and are exclusive of new development.
384.3	HOPCROFT Bevan & Wendy	Rule 23	Oppose	A percentage of the property would be a better measure. Farmers are given a consent for a specified period but when they come to renew it other farmers are able to apply and be treated fairly even if they haven't been winter grazing previously.
386.9	Hopcroft Farms Ltd	Rule 23	Oppose	Equitable ruling for all property sizes. Clarify how the three year average is to be calculated? From which base year? What information/evidence would ES require to support or demonstrate areas previously cultivated? All references to areas or percentages of land holdings to be removed from the plan. The wintering of stock should be a permitted activity as long as the farm complies with their Farm Plan and GMP's. I recommend that Rule 23 is revised and any reference to any area is removed. We support management plans in accordance with Appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for B (ix) to allow for adverse weather events.
387.14	HORRELL Andrew	Rule 23	Oppose	Remove any reference to areas or percentages of farms used for intensive winter grazing. The intensive winter grazing of a farms stock is a permitted activity. Focus on adoption of best management practices by farmers.
389.7	HORRELL P J & J M	Rule 23(b)(vi)		Require only mapping of new drains within intensive winter grazing areas.
392.2	HOWE Peter	Rule 23	Oppose	Remove 50/20 ha limits.
393.1	HSV Dairy Ltd	Rule 23	Oppose Amend	Consider using a percentage of land, as most people will only winter crop 10% of their farm per year, in conjunction with good management practices.

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394.3	HUDSON O F & S M	Rule 23	Oppose	Delete.
396.2	Hughes-Crowley Company Ltd	Rule 23	Oppose	The wintering of a farm business's own stock should be a permitted activity. Avoidance of consenting process.
399.2	HUMPHRIES Marie	Rule 23	Support	Retain.
401.2	HUMPHRIES Trevor & Karen	Rule 23	Amend	We believe a percentage of the property versus set area is fairer for larger properties.
402.11	HUNT Alistair & Bernadette	Rule 23	Amend	Remove the limit on area from this rule and require farmers to use their farm management plans to identify good management practices that they will apply to their intensive winter grazing.
405.1	Huntly Farm Partnership	Rule 23	Oppose	Remove set limits and replace with a percentage base approach i.e. 30%threshold for winter grazing. A 3 metre buffer applies to intensive winter grazing adjacent to duck ponds for Rule 23(b)(viii)
406.1	HUTTON Sue	Rule 23	Oppose	We need a lot more consultation on this yet before any rules are implemented.
407.4	HYLAND Maureen	Rule 23	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
413.4	Iron Bridge Farms Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares.
415.2	IRWIN Doug	Rule 23	Oppose	Limiting the grazing area without regard to property size is illogical. Remove sheep.
416.2	IRWIN Robyn	Rule 23(b)(vi)	Amend	Change all references to subsurface drains to require only new drains to be mapped or to have the phrase “where known” added to the requirement for drains to be mapped for consents, permitted activities and management plans.
417.1	J & K Stone Farming Ltd	Rule 23	Amend	I propose to use a percentage of land relative to the total block units as opposed to the 20ha/50ha limits.
418.2	J McLean Farming Ltd	Rule 23	Oppose	Modify the set limits for grazing in Rule 23(b)(iii) and (iv) so that crops other than beet can be used. We propose a percentage based approach and a per hectare limit. 25-30% threshold OR 50 hectares. Delete Rule 23(b)(vi).
419.2	J R & D M Smith Ltd	Rule 23	Oppose in part	Amend limits to 35% instead of 20 or 50ha. Leave the grand parenting of three year average.

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				Seek clarity of what a land use consent would look like. Remove growing 20 or 50ha of intensive winter grazing from being a restricted discretionary to controlled activity.
420.3	JACK Wallace	Rule 23	Oppose	Delete.
421.3	JAMES S T & K A Family Trust	Rule 23	Oppose	Oppose capping land allocation to 50ha, should be a larger percentage of landholding limit for larger farms. Oppose mapping of subsurface drains as near impossible as geography of land changes.
423.1	JANSSEN Mark & Martha	Rule 23	Oppose	Specify the winter grazing areas in percentage of total farm.
424.4	JARVIS Ben	Rule 23	Oppose	No specific decision requested.
425.4	Jedburgh Station Ltd	Rule 23	Oppose	The 50ha requirement for winter grazing must be amended to a minimum 15-20% of total property area and must be kept flexible.
425.5	Jedburgh Station Ltd	Rule 23	Oppose	Map new drains only.
426.4	JOHNSTON Allan & Robina	Rule 23	Support in part	Retain – Permitted activity until 2018. Support - in part approach system Rule 23(b)(vii) but not the calculation and rather negotiate and stick with my original submission estimate of simplicity of 1.=3M, 2.=6M and 3.=9M as results show that buffering strips excluding stock these calculations still work.
428.4	Jones & Cooper Builders	Rule 20	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
429.4	JOYCE Nathan J & Julie L	Rule 23	Oppose	As an alternative I propose: Apply a 25degree slope policy for cultivating land. Small percentage areas of above 25 degrees should be allowed to be cultivated also for ease of management (e.g., a paddock that majority is <25degrees, but has 2% ground area of >30degrees should be permitted). A 4 metre buffer is ample for all situations. Remove requirement to map all drains.
431.3	Kaikaha Farms Ltd	Rule 23	Oppose	The wintering of a farm business's own stock should be a permitted activity. Avoidance of consenting process.
433.6	Kapuka Dairies Ltd	Rule 23	Oppose	I propose that Rule 23(b)(iii) be amended to a restricted discretionary activity as this has blanketed both Old Matura and Peat Wetlands physiographic zones. Good management practices and a management plan should take preference not one rule applies to all, especially land owners with large land holdings and can sustainably farm with little impact. I propose Rule 23 (b) (vi) be amended to include new drainage only be mapped in the area for intensive

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				winter grazing.
434.4	Kauana Dairy Ltd & Taffy Ltd	Rule 23	Oppose	No specific decision requested.
435.4	KAY Gilbert	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
437.22	KEMPTHORNE Robert	Rule 23	Oppose in part	If a limit needs to be set at all (which is very debatable) % of land area would be appropriate. Suggest maybe 25-30%. Suggest Rule deleted and replaced with permitted activity provided good consideration and BMP.
438.4	KENNEDY John	Rule 23	Oppose	A management plan must be as simple as possible to enable it to be enacted easily. Once a management plan has been enacted a full refund of the Dairy Differential Rate must be given for every year that a management plan is in place. 50 ha limit too restrictive. 10 metres should be ample width of ungrazed grassland or scrubland
439.2	KENNEDY Murray	Rule 23	Oppose	I would like to see 15-20% of effective farm area.
440.3	KENT Rita	Rule 23	Oppose	This should be a permitted activity if the farmer has good management practices in place. Do not make a restricted discretionary activity over 50ha.
443.2	KING Farming Partnership	Rule 23		Delete 20ha of winter grazing threshold.
444.3	KING Henry	Rule 23(iv)	Amend	A percentage of 20% of a land holding should be a permitted activity.
446.1	KINGSBURY Grant	Rule 23	Oppose	Remove mapping requirement.
446.2	KINGSBURY Grant	Rule 23	Oppose	Delete 20-50 ha limit.
447.3	Kiwi Dutch Dairies Ltd (John van Vliet)	Rule 23	Oppose	Amend to use a percentage for landholding not a Hectare rate i.e. 15% of total landholdings for any Old Maitava and Peat soils and 25-35% for all other soil types within the Southland area.
448.3	Kiwi Dutch Dairies Ltd (Lucy van Vliet)	Rule 23	Oppose	Amend to use a percentage for landholding not a Hectare rate i.e. 15% of total landholdings for any Old Maitava and Peat soils and 25-35% for all other soil types within the Southland area.
450.4	Kmore Farming Ltd	Rule 23	Amend	Fifteen percent of landholding would be better than 50ha. Fodder beet more harmful to environment than brassicas. Had experience in this myself. Finding brassicas and less stock rate better. Dairy grazing should perhaps need consents more than breeding properties.

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451.8	Knockinnon Farm Trust	Rule 23	Oppose	We oppose the reference to any area as this impedes land rights.
452.1	KNOWLER John & Wendy	Rule 23	Oppose	A three metre buffer is ample to control intensive grazing on all land gradients.
453.3	KNOWLER Rohan	Rule 23	Oppose	Compromise with farmers who have been winter grazing for a reasonable period of time. May – September needs to be reviewed, it should be only June – August.
454.2	Kyler Pastorals	Rule 23	Oppose	Allow farmers to manage their own land and crop as much area as they require, applying correct buffer zones near waterways.
455.1	Kyler Pastorals	Rule 23	Oppose	Amend to allow farmers to manage their own land and crop as much area as they require, applying correct buffer zones near waterways.
456.1	Kynlallan Farming Company Ltd	Rule 23	Oppose	Need to work larger scale properties on a percentage basis not set Ha. 50 is too small.
458.3	L R & S J Hammond Ltd	Rule 23	Amend	Amend to increase thresholds if suitable for land. Change Rule to focus on actual zone being wintered on. This area should be per title or rated property.
459.3	Lagore Enterprises Trust	Rule 23	Oppose	If good management practises are already in place then farmers should have the opportunity to continue their current business model without the need for further consenting requirement. Not put a restriction on the number of hectares or the 3 year average of land cropped.
460.3	LAIDLAW Graham	Rule 23	Oppose	No specific decision requested.
461.3	LAMB Bruce & Gaye	Rule 23	Oppose	Amend to a 10% of landholding limit to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a discussion with the land sustainability team around their intentions for the winter.
463.2	LAMB Greg	Rule 23		50 hectares does not take into account the class of stock or size of property, recommend twenty percent of landholdings.
464.17	Landpro Ltd	Rule 23	Oppose	We propose a 20 % permitted baseline. A percentage based approach is consistent with the draft proposed water and land plan. We seek clarity around the proposed consenting framework that ES envisage with administering this rule.
465.3	Lankirk Trust	Rule 23	Amend	Allow for 60 ha and 150 ha of intensive winter grazing respectively, provided that the area does not comprise more than 20% of the effective area of the landholding. Align buffer zones with those proposed for waterways and different slope classes. Amend to state: (ix) good management practices are used to ensure mitigate any conspicuous discoloration or

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				sedimentation of any adjacent waterbody that is caused by overland flow of run-off water.
469.6	LEGG Rob & Nessa	Rule 23	Oppose	It should be a permitted activity to grow winter crop and winter graze for the total number of stock units a farm carries (worked out for a year/12 month period); 50 ha might not be enough to feed all the animals through the winter period. A consent should not be needed if greater than 50 ha is needed, provided good management practice is followed.
470.2	LIETZE Janet & David	Rule 23	Oppose	Have a 30% allowance of total farm area for intensive winter crop grazing.
471.3	LINDSAY Chris	Rule 23	Oppose	No specific decision requested.
472.3	LINDSAY Jill	Rule 23	Oppose	No specific decision requested.
473.4	LINDSAY Ray	Rule 23	Oppose	No specific decision requested.
474.4	LITTLE Robert Edsall	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural view points.
476.3	Lochhead Holdings Ltd	Rule 23		Remove the 20ha and 50ha limits and find alternative system.
477.7	Longwood Properties Ltd	Rule 23	Oppose	Delete, however if rule was to remain it should be amended from an arbitrary maximum number of hectares to a mechanism that relates to the grazing requirements of a typical Southland dairy operation 23(b)(vii) should be amended so that either the buffers widths be reduced to 5m is sufficient for slopes greater than 16 degrees and the buffer widths be reduced proportionately for slopes less than 16 degrees.
478.20	LOVERIDGE David	Rule 23	Oppose	There needs to have some allowance made for b(ix) as does not allow for adverse weather patterns.
480.5	Lowburn Ag Ltd (Jonathan Pemberton)	Rule 23(e)		Delete or change to discretionary.
482.14	Lower Aparima Catchment Group	Rule 23	Oppose	Clarify ruling for properties with mixed physiographic zones – allowance of up to 50 ha on any one contiguous landholding with a maximum Peat/ Wetland or Old Mataura area of 20 ha. Why should a consent be required to increase winter grazing by more than 20 ha if it occurs within the proposed hectare limits? How is the three year average to be calculated? From which base year? What information/evidence would ES require to support or demonstrate areas previously

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>cultivated?</p> <p>All references to areas or percentages of land holdings to be removed from the plan. The wintering of stock should be a permitted activity as long as the farm complies with their Farm Plan and GMP's.</p> <p>We support management plans in accordance with appendix N to be supplied to ES in lieu of consents.</p>
483.19	Ludell Ltd	Rule 23	Oppose	<p>Details around yield and stocking rates should be considered when determining limitations. Cropable area should be a percentage of total land title.</p> <p>Details around yield and stocking rates should be considered when determining limitations. Cropable area should be a percentage of total land title.</p> <p>Rule 23(b)(vi): Mark tiles when new lines put in or when maintenance done. Remove requirement to map older tiles.</p> <p>Rule 23(b)(vii): Proof from ES to show how these gradients are affected by overland flow before they become implemented.</p> <p>Rule 23 (b)(iv): Remove the 20 or 50 hectare limits and replace with other options such as a percentage of farm and type of farm operations.</p> <p>Rule 23(b)(ix): Remove and allow farmers to use their best practice around this.</p> <p>Rule 23 (c)(i): Remove and allow farmers to increase or decrease winter grazing however the individual farm needs to operate.</p>
486.4	M Gardyne Ltd	Rule 23(b)(vii(1-3))	Amend	Land that has a steep short bank out of a creek than flat land thereafter may still have a higher than 4 degree average angle but no difference in environmental impact to that with no short sharp bank. Is it measured from the top of the bank or the edge of the water?
487.4	M K H Farming Ltd	Rule 23	Amend	Amend Rule 23 threshold of intensive winter grazing, to 25% of total area of permitted activity.
488.2	MACDONALD Brian	Rule 23	Oppose	Amend to be 20% of farm winter crops. Slope degrees should be higher.

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491.4	MacGregor Motors (Balfour) Ltd	Rule 23	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
492.4	MACKAY Alexander	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
493.4	MACKENZIE Toni	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
494.2	MACKINTOSH Alistair	Rule 23	Amend	Delete references to specific areas and include limitations as a percentage of whole farm.
495.1	MACLEOD Neil	Rule 23		Amend to clarify.
496.3	MACPHERSON Chanelle	Rule 23	Oppose	The 20/50ha limits are not reasonable on our property, those capping limits are impractical. We understand the tile drain mapping would be a good practice but we cannot afford to reconstruct old layings – we will only find them as we are laying new ones. Perhaps mapping new/upgraded and newly discovered drains within winter grazing areas, not ALL tile drains. Perhaps mapping new/upgraded and newly discovered drains within winter grazing areas, not ALL tile drains.
498.4	MANN Alistair	Rule 23	Oppose	Limit of intensively winter grazing should be on a percentage basis with grazing of up to 15% of farm holding not needing a consent and over 15% needing a consent per land holding.
499.3	MANN Jeffery	Rule 23(c)	Amend	Should delay implementation until more data available and catchment limits set.
500.1	Mararoa Downs	Rule 23	Oppose	The rule says that only 20ha of peat wetlands and only 50ha of farm total can be cropped. It should be based on the farms total size.
501.3	Marlow Farms	Rule 23	Oppose	Upsize the proposed limits by 30 percent.
502.3	MARSHALL Allan & Kathryn	Rule 23	Oppose	I believe a 10% of landholding limit would be a far better option, to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a discussion with the land sustainability team around their intentions for the winter.
503.4	MARSHALL Logan	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both



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				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
504.4	MARSHALL Lynette	Rule 23	Amend	Consider this on a percentage basis as to the size of the property.
505.4	MARSHALL Norman	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.5	MARSHALL R C	Rule 23	Oppose	Push out the date to 2025. Remove the condition relating to farm management plans and replace with encourage. Amend (b) (iv) to the greater of 50 ha or 20% of the total property. Remove rule (b) (vii) s & 3. Amend (b) (vii) 1 to remove references to slope. Amend rule (b) (vii) to require mapping of any new or redeveloped drains only.
507.3	MARSHALL Spencer	Rule 23	Oppose	I believe a 10% of landholding limit would be a far better option, to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a discussion with the land sustainability team around their intentions for the winter.
508.1	Martyn Farming Ltd	Rule 23	Oppose	Set areas would be sufficient if land area is up to a particular certain total area. Any larger land holdings should be calculated on a percentage of the total land area per individual farm. Clarify where did these required setbacks come from and from what data? Who decided 20 metres was necessary for a >16 degree slope? Where is the scientific evidence to back these setbacks up. They are excessive and impractical.
509.3	Matai Farms Ltd	Rule 23	Oppose	Intensive winter grazing should stay a permitted activity as long as farmers follow best practice guidelines and/or have a farm management plan in place.
510.4	Mataura Butcher Shop Ltd	Rule 23	Oppose	Make permitted.
511.2	MCCALL Ashley John	Rule 23	Oppose Amend	Intensive grazing rules should only apply to Brassicas and Beets and there should be no rule of area or percentage of farm allowed for winter grazing.
515.7	MCCROSTIE Ray	Rule 23	Amend	Amend this rule to be on a percentage of each farm property. I would suggest that 30% would be an adequate proportion for intensive winter grazing on forage crops. Rule 23(b)(vi) Delete this rule. If ES was to make this voluntary they might get uptake from within the farming community - the big stick approach will only yield a negative response.

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				Rule 23(b)(viii) Modify this rule in relation to Lake Waituna. A better option would be to stipulate that Intensive Winter Grazing does not occur within 20m of the wetland reserve. Rule 23(c)(i) Amend this rule to a seven-year average.
516.3	MCDONALD Cameron	Rule 23(iv)	Oppose	Each property should not be restricted to 50ha winter crop.
517.4	MCDONALD Colin & Dot	Rule 23	Oppose	Remove restrictions.
518.9	MCDONALD Stuart & HALDER Robyn	Rule 23(b)(vii)		Concern about the arbitrary nature of the slope restrictions. Is this based on science or just rules for rules sake? This rule is overly restrictive for hill country farms. For simplifications, the three metre rule should apply regardless of slope.
520.5	MCELLIGOTT J W & T L	Rule 23	Oppose Amend	Provide a clearer definition of intensive winter grazing. It is unclear how or where we record the information and who decides what is acceptable.
521.4	MCEWAN Trevor & Anthea	Rule 23	Amend	<ul style="list-style-type: none"> <li>As an alternative we suggest using an area based threshold for properties 300 hectares and under.</li> <li>For properties over 300 ha the winter grazing threshold could be 15% of total effective area.</li> <li>Suggest mapping only new/upgraded or maintained drains within winter grazing areas. Not all tile drains.</li> </ul>
522.5	McFarm Trust - Pahia	Rule 23	Oppose	Amend to provide a ruling that is fair to all size land holdings. Physiographic science needs to be validated with consultation with the land owners. Provide clarification for properties with mixed physiographic zones.
524.2	MCINTYRE Craig & Rebecca	Rule 23	Oppose	The proposed over 20 hectare limit is impractical and I propose 10 to 15% of total effective area, Southland wide would be more workable.
525.4	MCINTYRE Hayden	Rule 23	Oppose	The areas need to be either a percentage of landholding or based on stock units.
526.4	MCINTYRE Peter	Rule 23	Oppose Amend	Remove prescriptive rules such as 20/50 ha limit and mapping tile drains and replace with a process of managing risks as best as possible.
527.4	MCKAIN Belinda	Rule 23	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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529.2	MCKAY Alistair	Rule 23	Amend	Amend to be on a stock unit basis and provide for more discussions with farmers, look at it as a case by case.
530.2	MCKAY Ian & Jodi	Rule 23(b)		Surely rules around crops need to be based on either stock units per farm or land area per farm.
531.3	McKee Highview Ltd	Rule 23	Oppose	We recommend that the plan revert to the previously suggested percentage basis and suggest 25% of farm title rather than 20/50 Ha limits.
532.2	MCKEE M & C Family Partnership	Rule 23	Oppose	Amend time frame to 30 <sup>th</sup> May 2020 and amend to 25% before there has to be a consent process.
533.3	MCKEE Rebecca	Rule 23	Oppose	We recommend that the plan remove the 20/50ha limits and revert to the previously suggested percentage basis and suggest 25% of farm title.
534.3	MCKEE Scott	Rule 23	Oppose	Allow wintering in Old Mataura. Amend Rule 23(b)(iii) to 25% of land area or should be done on a stock unit basis. Retain 23(c)(i)
535.5	MCKEE Tyler	Rule 23	Oppose	Clarify if approximately 30,000 leave the Old Mataura zone where do they end up wintering? Are they not going to cause more water problems elsewhere as in the Old Mataura we only have 2% dairy practice? Rule 23(b)(viii): Amend (b)(iii) to 30% area before there has to be a consent process Rule 23(c): Give farmers more time to be able to make the changes for the new rules, I think 30 May 2020. Retain Rule 23(c)(i).
536.12	McKelvie Ltd	Rule 23	Oppose	Amend so area is based on a percentage of effective farm over 15-20 %. Amend so not a consent based system. Delete 23(b)(iv)
537.6	MCKENZIE G & T Partnership	Rule 23	Oppose	Delete Management Plan requirements. We feel that this plan does not take into account the actual farm size, relative to the area allowed for intensive grazing. We think a much more realistic approach would be using a percentage of your farm as the allowable permitted activity.
538.5	MCKENZIE Hayden	Rule 23	Oppose Amend	<ul style="list-style-type: none"> <li>Land and water management plan in place if greater than 50ha of winter crop were to be put in</li> <li>Information/Education on the best way to plant crop in paddocks/graze off paddocks to prevent run off of sediment.</li> <li>Gullies have to run a certain amount of cubic metres of water, annually, to be classified as</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>a buffer zone.</p> <ul style="list-style-type: none"> <li>• Have a percentage of paddock classification i.e. if greater than 50% beyond 20 degrees.</li> <li>• Buffer zone should be assessed on a case by case basis if problems are identified and a plan put in place.</li> </ul>
539.4	MCKENZIE Matthew	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
540.1	MCKERCHAR Farm Partnership	Rule 23(b)(iv)(i)	Support	Retain.
541.2	MCLEAN Campbell	Rule 23	Oppose	Should only be 20ha where it is proved to be Old Mataura and 30ha on different soil type on the farm.
542.5	MCLEAN David	Rule 23	Oppose	Oppose this rule in its entirety with reference to my rejection of the “physiographic” zoning and hectare amounts that are unrealistic when compared to amounts needed to run a farm successfully.
545.6	MCLEOD Emma	Rule 23	Amend	Request the time frame is extended to 2020 to allow more time to construct a practical framework to manage the effects of intensive winter grazing. Reinstate using a percentage of the farmed area to provide for the winter feeding of stock.
548.4	MCMULLEN Leith	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
552.2	MCPHAIL Neil	Rule 23		Amend so good management practices are the focus here. Winter grazing needs to be a permitted activity as long as good management practices are used, such as setbacks from waterways and feeding the areas off in a way that decreases the loss of sediment and nutrients. These methods can be easily implemented in intensive wintering systems.
553.9	McPhelzo Trust (C G & M P Pullar)	Rule 23	Oppose	<p>As an alternative I propose:</p> <ul style="list-style-type: none"> <li>• Use an area based threshold for properties 300 hectares and under;</li> </ul> <p>For properties over 300 hectares, the winter grazing threshold could be 15 to 20 percent of the total effective area.</p> <p>Map only new/ upgraded or maintained drains within winter grazing areas. Not all tile drains</p>
554.10	McPhelzo Trust (Z, E & P	Rule 23	Oppose	As an alternative I propose:

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	Pullar)			<ul style="list-style-type: none"> <li>Use an area based threshold for properties 300 hectares and under; For properties over 300 hectares, the winter grazing threshold could be 15 to 20 percent of the total effective area.</li> </ul> Map only new/ upgraded or maintained drains within winter grazing areas. Not all tile drains.
555.13	MCRAE Daryl & Ruth	Rule 23	Oppose	Different rules for different classes of stock or exclude sheep from this rule. An effects based rule would allow for this. Use the area based threshold for properties up to 300ha and a percentage of area for larger properties. Farm Environment Plans cover management of buffers appropriate to stock class and stocking intensity. Mapping Tile Drains - Map only new or known drains within winter drop areas.
556.6	MCRAE Joe	Rule 23	Oppose	Instead of a 20-50ha limit I would propose 25% of the effective area on each individual land holding and focus on education and encouraging good behaviours. Increase length of consents to possibly 5 years, and reduce how strict the thresholds are. Increase angles to 10, 30 and 45 degrees. These could be suggested as best practice, rather than enforced as measuring is down to interpretation. Different stock classes could be included in this. Delete 23(c)(i)
557.5	MCRAE Matt	Rule 23	Oppose	I suggest 20% of the effective area on each individual landholding be permitted. Delete 23 (b) (v). Increase the length of the consent to 5 years. Encourage good behaviours through education on good winter management. Have a simple template that farmers must present on request if they fail to oblige by the rules instead of a consent. Increase angles to 10, 30 and 45 degrees. Make these guidelines/best practise as measuring is near impossible, and include different stock classes.
558.9	MCRAE Natalie	Rule 23	Oppose	Amend the 50ha rule to be 25% of a landholding. 23(b)(vi) include the word “known” before sub-surface drains. Rule 23(b)(vii) amend to state three metre buffer from all watercourses (regardless of slope). Rule 23(c)(i) remove this sentence altogether.
560.7	MCRAE Tim & Justine	Rule 23	Oppose	Base it on a percentage of your total farmed area. The 16 degrees needs to be increased to allow for more economic farming.
561.1	MENLOVE William	Rule 23	Oppose	Continue to allow winter grazing as a permitted activity and continue promoting best practice through land sustainability officers. Identify and understand that physical limitations of farms within zones are hugely varied therefore blanket rules, while to an academic appear fine, are grossly unfair and unworkable. Implement user-friendly practical management plans to negate the need for consents.
563.4	MEYER Timothy	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
564.11	Mid-Aparima Catchment Group	Rule 23	Oppose	We recommend that Rule 23 is revised and any reference to any area is removed. We support management plans in accordance with appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for B (ix) to allow for adverse weather events.
565.3	MIDDLETON Lindsay	Rule 23(a)(b)	Oppose	Change the date for Rule 23(a)(b) to 1 September 2018. Clarify Rule 23(b)1-3. Do these conditions apply to both pasture and forage crop grazing?
568.2	MILLER N & L J Family Trust	Rule 23	Amend	The area allowed for intensive winter grazing should be worked out as a percentage of the total farm area i.e. 25%.
569.8	MILLER R J Trust	Rule 23	Oppose	We propose a percentage based approach as per the draft copy of the pSWLP on the basis that it will be a fairer measure thus we propose 25-30 percent threshold as a permitted activity. We seek clarity of what a land use consent may look like, the likely duration and requirements to continue intensive winter grazing in the future. We seek that rules 23(b) to 23(f) apply from 30 May 2020. We seek that a three metre buffer applies to intensive winter grazing adjacent to duck ponds.
570.15	MILLER R L & S J Farm Trust	Rule 23	Oppose	Recognise that IWG is an integral part of farming in Southland. Delete all restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Change to: 3m for slope <8 degrees, 5m for slope between 8 and 20 degrees and 7m for slope >20 degrees. Delete the use of the farms past three years history and use stock numbers instead.
571.4	MILLER Susan	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
572.5	Ministry for Primary Industries	Rule 23	Amend	Retain the provision for implementation of any Independently Audited Self-Management (IASM) schemes developed in the future, along with some amendments to provide additional clarity and certainty. Including (i) what the requirements are for IASM scheme participants in order to be listed on the IASM Register (including that they may require a farm environmental management plan) and (ii) the requirements of IASM scheme providers in order to obtain Environment Southland's approval of either the scheme or the scheme provider.
574.4	MITCHELL G B & M D	Rule 23	Oppose	No specific decision requested.

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576.4	MOIR Joseph	Rule 23	Oppose	Educate farmers and put in place best management practices for intensive winter grazing that will minimise any detrimental effects but scrap this limit on area.
577.2	MOODY Luke	Rule 23(b)(vii)	Oppose	Delete Rule 23(b)(vii) and leave the land sustainability team to work with farmers to work out an appropriate cultivation plan. Delete 23(c)(i)
578.4	Moonlight Trust	Rule 23	Neutral	I would like a visit from ES Land Sustainability Officers every 2 years to look at each individual winter grazing paddock on a case by case basis.
581.3	MORRIS Lenore	Rule 23	Oppose	Farmers should not have to get consent to winter graze unless the land or surrounds are vulnerable. ES should identify vulnerable areas and consult with the farmers individually on this. No management plan unless they have been prior noncompliant or in breach. The farmers should be allowed to decide for themselves how much they can graze. Should not have to supply maps of existing drainage. Farmers should not have to fence all outer edges as outlined in this policy. If this is to be bought in then farmers should be compensated for loss of income.
582.3	MORRIS Peter & Norina	Rule 23	Oppose	Farmers should not have to get consent to winter graze unless the land or surrounds are vulnerable. ES should identify vulnerable areas and consult with the farmers individually on this. No management plan unless they have been prior noncompliant or in breach. The farmers should be allowed to decide for themselves how much they can graze. Should not have to supply maps of existing drainage. Farmers should not have to fence all outer edges as outlined in this policy. If this is to be bought in then farmers should be compensated for loss of income.
583.21	MOSEBY Ryan	Rule 23 (iii) & (iv)	Oppose	Do not agree with set area as a fair measure to be permitted activity. Do not agree with increased buffer zone based on slope. Current 3m rule is acceptable provided good management practice is applied to grazing management. Promote good management practice such as strategic grazing management to minimise the effects. Need detail on length of consent and what is incorporated in it. Is the application process something farmers can complete themselves? Promote good management practice instead of consent.
586.9	MOUAT Family Trust	Rule 23	Support	Retain.
587.1	MOUAT James	Rule 23		Buffer zone needs to be smaller and or degree of slope higher.
590.9	Mt Linton Station	Rule 23	Oppose	Recommend no more than 25% of property in intensive winter grazing unless resource consent granted. Mapping of all tiles in areas used for intensive winter grazing is unrealistic. Would agree that all new tiles are mapped appropriately.

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592.4	Mt Peel Ltd	Rule 23	Amend	We believe for bedrock/hill country zone a percentage basis will work more effectively. As people on average need 7-12% of their land to grow winter feed to feed their capital stock. So a hectare limit is not practical. 15% would be a far better solution in this physiographic zone. Instead of 3, 10 and 20 metres we propose 3, 6 and 12 metres. 20 metres may suit if the slope was steeper than 20 degrees.
593.1	MUIR Malcolm	Rule 23	Oppose	No specific decision requested.
595.4	MURRAY Rex	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
596.2	My Farm Ltd & Associated Farms & Kerr Road Dairy Ltd	Rule 23	Oppose Amend	Rule 23 should be amended with the words “the use of land for intensive winter grazing that did not exist at 30 May 2016 is a discretionary activity”. The use of land for intensive winter grazing that existed at 30 May 2016 is permitted activity provided conditions of Rule 23(b)(i)(ii) and (v) to (ix) are met, (but not rules (iii) and (iv)).
598.4	Newton Slink Skins	Rule 23	Oppose	Make permitted.
599.2	NEWTON T W & L M	Rule 23	Oppose	Delete.
603.6	Nithdale Station	Rule 23		Use a percentage of total farm area – perhaps 6% for riskier zones and 15% for less risky zones before a consent is required.
604.4	Nokomai Station Ltd	Rule 23	Oppose	I propose a percentage based approach i.e. 15 % of property can be intensively winter grazed as a permitted activity. This threshold will account for larger solely intensive winter grazing operations. I also seek some clarity around the intensive winter grazing on a landholding when a part of it is contained within the Alpine Zone (but not winter grazed up there).
605.1	Noremac Ag Ltd	Rule 23	Oppose Amend	The rule should relate to a percentage of total landholding, my suggestion 15-20% total landholding as a permitted activity.
606.3	Norham Farm Ltd	Rule 23	Oppose	The requirement for a consent should be minimum of 50Ha or 10% of your effective farming area, whichever area is larger (e.g. 1000 Ha farming operation can intensively winter graze up to 100 Ha of the property before they are required to obtain a consent.) There should not be a requirement for a consent to be obtained for winter grazing (even if it is over the target Ha) if it is only sheep that will be winter grazed on the forage crops.  Please create vegetation strip allowances that are for sheep intensive winter grazing that are of



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				a smaller requirement to fairly represent the minimal damage this class of stock causes.
607.1	North Range Partnership	Rule 23	Amend	We oppose the 50ha restriction; feel it would be more practical and fair to be based on a percentage of farm size.
609.4	NZ Deer Farmers Association – Southland Branch (Richard Cook)	Rule 23(b)	Amend	Amend 23(b): NZDFA-Southland would prefer that industry and council discussions determine a fair and effective approach to ensuring that winter grazing is managed to minimise off-farm environmental impacts. Clarify for Rule 23 (b)(vii): How distances from waterbodies for non-winter grazing (set-backs) are calculated.
613.4	NZ Groundspread Fertilisers Association Inc.	Rule 23	Oppose	Amend to increase timeframe, redefine landholding to take into account scale of property, and the amount of vegetative strips and how they are applied practically in relation to slope.
615.3	O'CONNELL Dennis	Rule 23	Oppose	No specific decision requested.
616.7	O'CONNELL Elizabeth	Rule 23	Support	Support Oxidising be separated from Old Mataura & Peat Wetlands zone. Revert to 15% of landholding as a permitted activity.  That there be only two setbacks: up to 10 degrees with a 3 metre setback, and above 10 degrees with a 10 metre setback.  That the slope calculation and setback be measured 'along the ground' from the waterway rather than to a point being 20m from a horizontal distance from the waterbed, which cannot be measured with the accuracy implied by a three tier regulation.  A need for tolerance around slope and setback measurements to acknowledge the practicalities of cultivating in hill country.  That ponds under the size of 2ha be excluded from this rule.  Recommend that in a 'status quo' business a consent be able to be obtained for a five year period.
617.3	O'NEIL Craig & Colleen	Rule 23	Amend	It should be a percentage of the landholdings not 50 ha's.
618.4	Onepu Farms Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares.
619.4	Opio Milk Ltd	Rule 23	Oppose	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

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				result we would see the use of best practise not require consents to winter cows.
621.1	Otara Dairies Ltd	Rule 23	Oppose	Leave this rule out until limit setting.
622.24	P F Olsen Ltd	Rule 23	Support Amend	Amend footnote 3 to Rule 23 to note that <ul style="list-style-type: none"> <li>- distance is <u>measured horizontally, not as slope distance, and be measured back from the top of the bank of the bed of the river or stream,</u></li> <li>- Add guidance by way of diagrams to show how slope should be measured.</li> </ul>
623.4	P H Bennett Ltd	Rule 23	Oppose	Amend this rule because you are requiring all farmers to produce a new Management plan every year. This is unrealistic. Once we have a management plan and your farming practices are not changing each year then the original plan should suffice other than the odd amendment each year. Producing a new plan each year is costly and time consuming. Amend this rule for flat finishing farms. If this was based on a percentage/Ha, or land use type it might be more practical.
624.4	Paraemara Ltd	Rule 23	Oppose	Change the quantity of land allowed for winter grazing to 10-15% at least, to accommodate larger properties and so farmers can feed stock adequately.
625.2	Parawa Ltd	Rule 23(b)(iv)	Oppose	23(b)(iv): Change 50ha limit for large scale sheep and beef units to 15% of landholding is able to be cropped before consent is required. 23(b)(viii) Lakes need to be defined and current fenced off duck ponds with riparian strips remains status quo.
626.2	PATERSON L J & S M	Rule 23	Oppose	No specific decision requested.
627.5	PATERSON Ross	Rule 23(b)(iv)	Amend	23(b)(iv): Remove limits and use past averages and stock numbers to come up with a number. 23(b)(vii): Three metres up to 16 degrees and more steeper than that. Also stock can be held further back through winter and edges eaten last.
628.6	PATERSON Stephanie	Rule 23(b)(iv)	Amend	23(b)(iv): Remove blanket thresholds for winter grazing and manage in accordance to the management plan prepared for each individual landholding. Amend 23(b)(vii) so that 3 metres up to 16 degrees, but greater than 16 degrees would require a greater buffer. Take care and use good management to ensure careful grazing of the areas closest to waterways.
629.1	PATERSON Tony	Rule 23(a)(iii) & (iv)	Oppose	Provided that there is a farm management plan provided to Environment Southland that is acceptable there will be no limits to what you grow on your farm or what stock you can graze.
630.4	PATTULLO Pauline	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both

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				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
632.4	Peat View Dairies Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares.
634.3	PETER Hayden Trust	Rule 23		<p>Move back to say 15% of the farm under cultivation (winter crop) rather than a fixed Xha.</p> <ul style="list-style-type: none"> <li>• Suggested buffers on slopes: <ul style="list-style-type: none"> <li>○ 3m buffer slopes 10 degrees</li> <li>○ 10m buffer slopes 10-20 degrees</li> <li>○ 15m buffer slopes 20-30 degrees</li> </ul> </li> <li>• Winter 1 May – 1 August.</li> </ul> <p>Ability to mechanically clean the tile outlets/ditches over fence.</p>
635.4	PGG Wrightsons	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
636.1	PIKE Jonathan	Rule 23	Oppose	Old Matura – area allowed for intensive winter grazing should be 20ha or up to a maximum of 20% of the total property area.
637.1	PINCKNEY Edward, MACGILLIVRAY Craig & STIRLING Paul	Rule 23	Oppose	We recommend that the rule be revised to have no reference to area. We support best practise in conjunction with a Farm Environment Plan.
638.4	Pinnacle Farming Company Ltd	Rule 23	Amend	<p>Rule 23 (b) (iii) (iv)</p> <p>A percentage rate based on land holding rather than a nominated area would be fairer, and have less economic impact, provided that the percentage is workable. A percentage of 20%? For self contained dairy units, but consideration would need to be given as to a suitable percentage for run off blocks.</p> <p>Rule 23(b)(vi): Clause to be changed to ‘known sub-surface drains’.</p>
639.4	PITCHER Brian	Rule 23	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
640.37	Pourakino Catchment Group	Rule 23	Oppose	<p>Amend to a percentage based rule based on 20% of the effective area of the landholding.</p> <p>23(b): (iii) No more than 50ha total of intensive winter grazing is undertaken on a landholding.</p>

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				<p><u>(1) No more than 20ha of intensive winter grazing is to be undertaken within the Old Matura and Peat Wetlands physiographic zones within a landholding.</u></p> <p><u>(2) No more than 50ha of intensive winter grazing is to be undertaken within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces physiographic zones within a landholding.</u></p>
641.3	POYNTZ-ROBERTS David	Rule 23	Oppose	<p>The HA per farm need to be set as a percentage of farm size not an across the board figure. There should be a buffer zone but the slope degree's need to be looked at.</p> <p>Rule 23(b)(vi): New drains put in can be mapped – not old drains.</p>
642.5	PREBBLE Lynden	Rule 23	Oppose Amend	<p>The 20/50 ha rule should be amended to be 20/50ha maximum for farms up to 350 ha and then a maximum of 15% to the farm area for farms over 350 ha. Map only new drains. Sheep should be excluded from this rule.</p>
643.5	PREBBLE Sandra	Rule 23	Oppose Amend	<p>As an alternative I propose to map only new drains. As an alternative I propose sheep should be excluded from this rule. The 20/50 ha rule should be amended to be 20/50 ha maximum for farms up to 350 ha and then a maximum of 15% of the farm area for farms over 350 ha.</p>
644.1	Premier Dairies Ltd	Rule 23	Oppose	<p>I would be much happier to work alongside ES to understand the issues that you see and together come up with ways that to mitigate them that are both meaningful and practical.</p> <p>Some questions on this rule that I would like to see publically addressed:</p> <ol style="list-style-type: none"> <li>1. Where have the areas of 20 ha and 50 ha of land come from? The rumours surrounding this are that these numbers were picked because ES would have sufficient staff to deal with this number of farmers. If this is true it is very off putting and makes me cynical about the whole process as this does not treat everyone fairly.</li> <li>2. How long will these consents run for and what will be the costs associated with them?</li> <li>3. Will everyone share the bill of policing these few or will the few be laboured with the full cost.</li> </ol>
645.5	PRICE William	Rule 23	Oppose	<p>Push out the date to 2025. Remove the condition relating to compulsory farm management plans and replace with encourage. Amend (b)(vi) to the grater of 50 ha or 20% of the total property. Remove rule (b)(vii) 2 and 3. Amend (b)(vii) 1 to remove reference to slope. Amend rule (b)(vi) to require mapping of any new or redeveloped drains only.</p>
646.3	Progress Valley Farms Ltd	Rule 23	Oppose	<p>I believe a 10% of landholding limit would be a far better option, to allow a 10 year re-grassing programme. Farmers winter grazing more than 10% a year probably need to have a</p>

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				discussion with the land sustainability team around their intentions for the winter.
647.7	Progressive Engineering Southland Ltd	Rule 23	Oppose	Delete.
648.4	Puke Rua Dairies Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares.
649.4	Puke Tahi Dairies Ltd	Rule 23	Amend	Restricted area in the plan should be a percentage of landholding rather than a set number of hectares.
650.3	PULLAR I J & K M	Rule 23(b)(vi)	Oppose	Remove requirement to map tile drains.
651.2	PULLAR Logan Trust	Rule 23	Oppose	At least 50% of landholding able to intensive graze.
652.6	PULLAR Mary	Rule 23	Oppose	Use an area based threshold for properties 300 hectares and under: For properties over 300 hectares, the winter grazing threshold could be 15 to 20 percent of the total effective area. Map only new/upgraded or maintained drains within winter grazing areas. Not all tile drains. In 2016 Winter has not in effect commenced until July – it would be more appropriate to use a definition that captures the actual climatic conditions.
653.1	QUERTIER Stewart & Jan	Rule 23	Support	Retain.
654.2	R D & J D Stewart Ltd	Rule 23	Oppose	Should remove 20 metre rule for sheep completely and/or reduce 20 metres to 10 metres. Distinguish between classes of stock, sheep versus cattle and deer.
655.8	RABBIDGE Dean	Rule 23	Oppose	Rule 23(b)(iv)I feel that a percentage of total farm area would be better than a 50 hectare limit. Rule 23(b)(vii)(3): I feel that allowing to plant winter feed on slopes within 20 metres should be allowed on the provision that they are only grazed in favourable weather and soil conditions.
656.6	RABBIDGE Stephen	Rule 23(e)	Amend	Does (e) mean that farming more than 100 ha becomes a non-permitted activity? If so, the threshold needs to include land holdings of any size. Enforce a requirement of a Management Plan on non-compliant farmers only.
659.3	Rathfriland Ltd	Rule 23	Oppose	The allowable area before consents are required needs to be substantially higher. Delete 23(b)(vi) Amend 23(b)(vii) to make the vegetation buffers a requirement but the exact distances more a guideline.
660.2	RAUBER Kass	Rule 23	Oppose	20 ha and 50 ha limits must be removed.

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661.40	Ravensdown Ltd	Rule 23	Support in part Oppose in part	Ravensdown seeks the permitted activity status of Rule 23 to be retained. Ravensdown seeks the following amendments to Rule 23: <ul style="list-style-type: none"> <li>• Delete Part (b) condition (ix);</li> <li>• Separate Rule 23 into several rules similar to the suggested restructure of Rule 20 above;</li> <li>• Delete Part (c) matter of discretion 3.</li> </ul>
663.1	RDAgritech Ltd	Rule 23	Amend	Amend the wording of Rule 23, so that: The maximum amount of land within a single landholding that can be intensively winter grazed as a permitted activity is 50 ha, and the maximum amount if land per landholding that may be intensively winter grazed Old Mataura and Peat Wetlands physiographic zones as a permitted activity is 20 ha.
665.1	Ribbonwood Farm	Rule 23	Amend	Environment Southland needs to assess recommendations on a case by case basis.
666.16	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 23	Oppose	Replace the 20ha/50ha restrictions with a wintering area based on 15% land area.
667.7	Riverfield farms Ltd	Rule 23	Oppose	We believe this rule needs removed and support the management plans in accordance with Appendix N be submitted prior to any consents. As a result, there would be limited consents and the consents would be for the right areas.
668.5	Riverdale Dairies Ltd	Rule 23	Oppose	We are opposed to this Rule and instead are supportive of the Management Plans in accordance with Appendix N being 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.
669.4	ROBB Alfred	Rule 23	Oppose	Delete all references based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
670.4	ROBB Tony & Jill Family Trust	Rule 23(iii)	Amend	When amount of affected land is less than 25% of total land area and a management plan with minimum and maximum levels in place the area should be ignored. Strike out the rule and replace with good management practice guidelines and nutrient budgets. Remove 20/50ha limits and set different limit sizes depending on the size of the property and the area occupied by Old Mataura.
671.1	ROBERTS Andrew	Rule 23	Oppose	The glossary definition of 'intensive winter grazing' is restrictive, ambiguous and gives no real allocation to the meaning of 'Intensive'.

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672.5	ROBERTSON Antony	Rule 23	Oppose	Proposed – 50ha of crop allowed up to a 250ha farm. Above that 20% of area allowed in crop.
673.2	ROBERTSON Colin	Rule 23(b)(vii)	Amend	Would like to see buffer distances reduced to 0-4 degrees, stay at 4 metres. 4-16 degrees, be 6 metres. Greater than 16 degrees, 10 metres.
676.2	ROBINSON Brent	Rule 23	Amend	Change from a hectare provision to a 15% of the effective farmed acreage. Leave a per hectare 20/50ha for a farm up to 200ha and reduce the 2 <sup>nd</sup> buffer band from 10 metres to 4 metres and the 3 <sup>rd</sup> buffer band from 20 metres to 5 metres.
677.2	Robinson Dairies Ltd	Rule 23		Perhaps a limit as a percentage of the land owner's total area owned would be more appropriate, as it is more likely to align with the requirements (and livestock carrying capacity) of any property.
678.4	ROBINSON Jeffrey	Rule 23	Oppose	Amend the rule to allow for 15% of the effective area of landholding to be used for intensive winter grazing. Amend the rule to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more.” Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope.
679.4	ROBINSON Michael	Rule 23	Oppose	Amend the rule to allow for 15% of the effective area of a landholding to be used for intensive winter grazing. Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more’. Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope.
680.1	ROBINSON Samantha	Rule 23 (iii)& 23(iv)		I believe the 50/20 ha limits should be replaced with a percentage of the farm rather than a set area.
681.13	Rockytommy Farming Ltd	Rule 23	Oppose	We propose a percentage based approach as per the draft copy of the PSWLP on the basis that it is a fairer measure and will be more reflective of each property, thus we propose 25-30% threshold as a permitted activity. We seek clarity of the definition of a lake to be included within the PSWLP and that a 3m buffer applies to intensive winter grazing adjacent to duck ponds. We seek clarity of what a land use consent may look like, the likely duration, and the requirements to continue intensive winter grazing in future.

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				We seek that Rules 23(b) to 23(f) apply from 30 May 2020.
682.9	Rokenwai Farming Ltd	Rule 23	Oppose	We propose a percentage based approach as per the draft copy of the PSWLP on the basis that it is a fairer measure and will be more reflective of each property, thus we propose 25-30% threshold as a permitted activity. We seek clarity of the definition of a lake to be included within the PSWLP and that a 3m buffer applies to intensive winter grazing adjacent to duck ponds. We seek clarity of what a land use consent may look like, the likely duration, and the requirements to continue intensive winter grazing in future. We seek that Rules 23(b) to 23(f) apply from 30 May 2020.
684.3	ROSE David	Rule 23	Oppose	Remove area criteria and rethink setback distances as not currently practical.
685.2	Rosebrae Farm Ltd	Rule 23	Amend	Increase the 20 degree wintering rule to 30 degrees.
686.1	Rosehill South Ltd	Rule 23(b)(iv)	Oppose	Amend the 50ha limit.
688.1	ROSS Garry	Rule 23	Oppose	Rule 23(b)(4) - It should be done on a percentage of the farm size e.g. up to 20 or 25% of the farm in crop or you get a permit. Rule 23(b)(6) - Remove requirement to map tile drains.
689.5	ROSS Keith	Rule 23	Oppose	Push out the implementation date of May 2018 to 2025. Remove the condition relating to mandatory Management Plans and replace with “encourage”. Amend (b)(iv) to the greater of 50ha or 20% of the total property. Remove rule (b)(vii) 2 and 3 and amend (b)(vii) to remove references to slope. Amend rule (b)(vi) to require mapping of any new or redeveloped drains only
690.5	ROSS Warren	Rule 23(b)(4)	Oppose	Rule 23(b)(4) - It should be done on a percentage of the farm size e.g. up to 20 or 25% of the farm in crop or you get a permit. Rule 23(b)(6) - Remove requirement to map tile drains A considered and rationalised definition of intensive winter grazing, supported by evidence, needs to be provided. E.g. a percentage of total property – say 15%.
691.5	Rosland Farming Ltd	Rule 23	Oppose	A considered and rationalised definition of Intensive winter grazing, supported by evidence, needs to be provided e.g. a percentage of toatal property – say 15%.
692.5	ROWE Emma	Rule 23	Oppose	The rules around maximum hectares on physiographic zone need to be reviewed. Amend this rule to a percentage of area on farm above a certain amount of hectares or at least that they



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				can winter their own stock on farm. Clarify whether any work been done on the environmental effects of wintering on heavier soil type? Clarification is needed around what areas are classed as physiographic zones. For example if you have 70ha of Old Maitava and 100ha of Oxidising could you do 20, 50 or 70ha of winter cropping?
693.6	ROY Bevan	Rule 23	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
694.4	ROY Bruce	Rule 23	Oppose	Use an area based threshold for properties 300 hectares and under. For properties over 300 hectares, the winter grazing threshold could be 15 percent of the total effective area. Map only new/ upgraded or maintained drains within winter grazing areas. Not all tile drains.
695.4	ROY James	Rule 23	Oppose Amend	Map only new/upgraded or maintained drains within winter grazing areas. Not all tile drains. <ul style="list-style-type: none"> <li>Use an area based threshold for properties 300 hectares and under;</li> </ul> For properties over 300 hectares, the winter grazing threshold could be 15 percent of the total effective area.
696.2	RUDDENKLAU I & J	Rule 23	Support	Paddock grazing of sheep on pasture should not come under any winter grazing restrictions.
697.4	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 23	Oppose	Delete.
699.4	Rural Livestock Ltd	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
700.3	Rural Solutions Ltd	Rule 23		Remove the 20ha and 50ha limitation and restriction of increases by using a three year rolling average
701.3	RUYGROK N C & N (Nicholas Ruygrok)	Rule 23	Oppose	I would like to see ES use a percentage for landholding, not a hectare rate. Example: fifteen percent of total landholdings for any Old Maitava and Peat soils and 25-35% for all other soil types within the Southland area.
702.3	RUYGROK N C & N (Nicolazina Ruygrok)	Rule 23	Oppose	I would like to see ES use a percentage for landholding, not a hectare rate. Example: fifteen percent of total landholdings for any Old Maitava and Peat soils and 25-35% for all other soil types within the Southland area.
703.1	Ryan Dairies Ltd	Rule 23	Oppose	Change the wording of the rule to allow 50ha of intensive winter grazing on farms partially

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				within the Peat Wetlands physiographic zone.
704.5	Ryan Farms 2006 Ltd	Rule 23	Oppose	We support the proposed environmental plans in accordance with appendix N and that these are submitted to council for approval in lieu of consent based on an arbitrary number.
705.3	SALLIS Robin	Rule 23	Support	I support rule 23. I request that any riparian management plans prepared under this rule follow eco-sourcing principles where practical.
706.12	Sandy Creek Trust	Rule 23	Oppose	Left to the farmers to do good cropping practices. 23(b)(vi) Map only new drains and mark repair work and outlets.
708.2	Scandrett Rural Ltd	Rule 23	Amend	The area of winter crop should be based on a percentage of the effective farm area. 23(b)(vi) should be amended to “any known subsurface drains”...
711.9	SCOTT G D & M M	Rule 23	Amend	23(b)(ix): Clarify that farmers have no control over these in heavy rainfall and snow melt. 23(iii): Amend to a percentage based rule (20%) of effective landholding. 23(vii): Too difficult and impractical to measure degree of slope. No clear understanding of what is classed as a wetland, modified watercourse or artificial watercourse. Refer to Telford Strategic Grazing Trial Results.
712.30	Seaview Trust & Oraka Farms Ltd	Rule 23	Oppose	Recommend allowing a 50ha threshold across Southland or limited to 20% of landholding. It is important wintering in Southland is undertaken as per GMP. This is best achieved through Farm Management Plans, informed by the physiographics outside the Plan. Remove the 100m setback in the coastal marine area and move to a GMP consideration. More consideration for simplicity of the rules relating to setbacks from watercourses. Recommend all levels of consent need to be restricted discretionary to give certainty to consent applications
714.4	SELLWOOD Luke	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
715.4	SHALLARD David & Kim	Rule 23	Oppose	How does the new 20 hectare rule work? Does it just apply for the Old Mataura Physiographic Zone, or does it apply for my whole property because I have Old Mataura?
716.4	SHALLARD Mark & Tania	Rule 23	Oppose Amend	As an alternative I propose: the wording be changed in rule 23 (b)(ii) as follows: Not more than 20 ha of intensive winter grazing is undertaken on the land in Old Mataura or peat wetlands physiographic zones (not landholding). If a business has more than one block and if one block has Old Mataura and the other(s) doesn't, their limit for the total area of

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				intensive winter crop should be 50ha. Mapping of tile drains should only be done for new, upgrading or maintaining.
717.4	SHALLARD Murray & Jo	Rule 23	Amend	<p>No resource consent for winter grazing areas over 20 ha &amp; 50 ha respectively, but.</p> <p>ALL commercial farmers (&lt;50ha) must provide on request an updated farm environmental management plan including maps, nutrient budgeting, and best management practices. In return those farmers selected, ES or governing authority must provide robust and transparent monitoring of sediment, nutrient and bacteria specific to land holding, working with land holders to better understand the relationship between their farming system and its effects on the local and regional environment (much the same as compliance officers work now with discharge effluent). Not all farmers would be 'audited' but randomly selected and given minimum 3mths to provide and participate in regulation of land &amp; water plan 2020 in any particular season.</p> <p>All cost(s) associated with monitoring, research and interpretation be shared equally by all ratepayers of the Southland area. All costs associated with compliance and meeting the limits be borne equally by each industry group, i.e. dairy, deer, grain etc. reflected in either rates or 'auditing'. Trialling of technology and experimenting to monitor variables and changes must be encouraged with greater flexibility and potential to adjust land use/nutrient use on a farm by farm basis.</p> <p>Set out a transition period of 3-5 years based on physiographic zones, with limits based on a combination of limit setting and no more than 20% of land holding for all physiographic zones (except alpine &amp; peat wetlands) for intensive winter grazing (assuming rest of plan is complied with).</p> <p>Together in combination with the limits setting policy, a comprehensive interrelated approach can be formulated and audited using the farm environmental management plan and the results of monitoring by compliance officers as the template of future regulation.</p> <p>By the end of the year 3 mark, using 3 seasons of information, as a process to analyse data, compliance, research and technology can adjust and modify regulation taking effect for compliance by the start of year 5.</p> <p>If sediment traps, creating wetlands, riparian work (existing or new) can prove the water quality remains within or below limits will there be discretion by ES for more intensification (nutrient use, land use) and adjustments permissible based on evidence of the water quality on</p>

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				<p>a farm by farm case?</p> <p>Adopt a 15-20% range of land holding available for intensive wintering area rule for all zones (except alpine, peat wetlands). Outside of alpine or peat wetlands, anyone wishing for more does not need to apply for resource consent. Provided, ALL commercial farmers (&lt;50ha) must provide on request an updated farm environmental management plan including maps, nutrient budgeting, and best management practices. In return ES or governing authority must provide robust and transparent monitoring of sediment, nutrient and bacteria specific to land holding, working with land holders to better understand the relationship between their farming system and its effects on the local and regional environment (much the same as compliance officers work now with discharge effluent).</p> <p>Not all farmers would be 'audited' but randomly selected and given minimum 3mths to provide and participate in regulation of land &amp; water plan 2020.</p> <p>At a cost to all ratepayers, the collection, monitoring, interpretation and application of all science, technology, consultation, collaboration and transparency for the educating and support of the whole community in the changing nature of land use and communicating the perceived future direction of land use in Southland.</p> <p>Create a committee, taskforce or team representing council (community), Iwi, farmers, industry, agri-consultants, scientists and compliance senior management combining to oversee Southland farming's' agriculture environmental impact and through shared commitment and collaboration contribute and direct the Water &amp; Land plan objectives. Collaborating and communicating with transparency and integrity as a unified group the expectations, regulations and processes to all involved across the partnership.</p> <p>Transition time of 3 years where best practice regulation is adjusted and modified as well as a willingness to contribute to meaningful, open, honest and transparency of methodology and widespread consultation with farmers to find a balance between the theory and practice of the monitoring (what works). Like the TMO in sport, the use of discretion must lie with the</p>

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				benefit of doubt favouring the attacking team i.e. the farmer
718.11	Shallow Croft Ltd	Rule 23(b)(ii)	Oppose Amend	Amend rule 23(b)(ii) so not more than 20ha of intensive winter grazing is undertaken on the land in the Old Mataura or peat wetlands physiographic zones (not total land holding). May be more appropriate to use a percentage amount based on land holding. If maps have been lost or become unreadable, they should only be re-mapped when maintaining or up-grading tiles or if Environment Southland want new maps for tiles and drains, then they could pay for them to be completed
719.3	Sharp Trust	Rule 23(vi)	Oppose	Delete.
720.2	SHAW Robert	Rule 23	Amend	Would like to see cultivated land calculated as a percentage of land owned e.g. 25%
721.3	SHEARING Dean	Rule 23	Oppose	Remove limit on how many hectares can be cropped per landholding.
722.2	SHEARING Gordon	Rule 23	Support	Retain.
723.3	SHEARING Raymond	Rule 23	Oppose	Remove ha limit.
723a.3	SHEARING Euan & Lisa	Rule 23	Oppose	Remove ha limit.
724.4	SHIRLEY Wayne & Gaye	Rule 23	Oppose	Delete the limitations on areas of land that can be intensively winter grazed.
726.6	Slattery Trust	Rule 23(b)(iii)	Oppose	We would like to see a 15 percent provision of total landholding be available for intensive winter grazing or be able to keep our present area of winter grazing available in future, but no increasing area. At least be on an equal playing field with the other physiographic zones of 50 hectares of intensive winter grazing per landholding.
727.2	SLOAN P J & J M	Rule 23	Amend	23(b)(iii) A percentage of land should be determined instead with reasonable scope for possible development (regrassing), cropping failure due to climatic events/pests or disease resulting in need for extra feed sources. 23(c)(i): Include a level of tolerance of 10-20% i.e. farmer has 2000 ewes but has been able to improve management to carry extra 200 ewes, with no negative environmental impacts.
728.4	Slope Point Farms Ltd	Rule 23	Amend	The area restrictions proposed should be dealt with on a farm by farm basis. This should be dealt with in the environmental plan for the property. Status quo operations should not have to apply each year for a permit. Vegetation buffers can be addressed in individual paddocks whereas a light grazing of the buffer zones can be allowed over dry period. Delete requirements to map drains and if all issues are addressed in the farm plan then delete consent requirements.
729.2	SMAILL C F & A S Trust	Rule 23(b)(iii)	Oppose	Amend to a percentage to allow for the different size units.

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730.5	SMALLEY Timothy	Rule 23	Oppose	We oppose this due to not enough professional help trained or available to help draw up plans required.
731.7	SMITH Barry	Rule 23		<ol style="list-style-type: none"> <li>1. Set the amount of winter grazing to a percentage of landholding to 20% for all areas.</li> <li>2. Remove the unworkable angle regime and set the margin of fencing from waterways to 3 metres.</li> </ol>
732.4	SMITH George & Kathryn	Rule 23		<p>Should our General relief not be accepted, we submit that:</p> <p>Amounts of winter grazing should be as a percentage of the farm area rather than a set area per farm.</p> <p>Reduce vegetation buffers for grazing sheep.</p> <p>If water leaving the property is okay; maps, monitoring and Environment Southland involvement in policing this is unnecessary.</p>
733.15	SMITH Hamish & Karen	Rule	Support in part	<p>23(b)(iv): Reconsider the 50ha limit in low risk physiographic zones and replace with limits based on grazing requirements of the farm, their soil and farm structure, or as a percentage of the land area.</p> <p>Amend Rule 23(b)(vi) to state that “in intensive winter grazing areas, farmers must map any <u>currently known tile drains</u>, new tile drains, and any existing tile drains that undergo maintenance or upgrading.”</p>
735.2	SMITH William	Rule 23		<p>Reduce time frame.</p> <p>Allow tile drains as a permitted activity and remove requirement to map.</p>
737.20	Smithill Ltd	Rule 23	Oppose	We believe that this should be managed by best on farm practice, the council should provide advice and suggestions on how to minimise the impacts of particular farming methods rather than dictating the land use on individual farms. We believe that the landholders and council should work together to achieve the maintenance and improvement of water quality by liaison.
738.3	Snowdon Downs	Rule 23	Oppose	Should be a larger percentage of landholding limit for larger farms. Oppose mapping of sub-surface drains.
739.2	SOMERVILLE John	Rule 23	Amend	<p>23(b)(iv): Amend to state that the 50 ha has to be greater than 15% of farm area before to becomes a discretionary activity requiring a consent.</p> <p>23(b)(vi): Record recent drains only.</p> <p>23(b)(vii): Rule needs amended to a larger series of guidelines and farmer obligations.</p>
740.3	South Coast Dairy Ltd	Rule 23	Oppose	Leave any restriction on the area able to be used for intensive winter grazing until Limit Setting stage

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				The proposed plan should clearly define what stocking rate is considered as “high” or intensive
743.4	Southern Farms NZ Ltd (Brendon Phillips)	Rule 23	Oppose	Remove restrictions on area to be able to be cropped and include ability to crop on land over 16 deg.
744.2	Southern Farms NZ Ltd (Gene Bryce)	Rule 23	Amend	Use a percentage area of total property. Short growing season on hill country, summer dry, long winter require 15% - 20% total farm in crop due to lower crop yields.
745.1	Southern Farms NZ Ltd (Brendon Duthie)	Rule 23	Oppose	Delete 50ha limit and amend limit to 15% of farm area. Delete setbacks.
747.7	Southern Star Farms Ltd	Rule 23	Amend	Amend this rule to be on a percentage of each farm property. I would suggest that 30% would be an adequate proportion for intensive winter grazing on forage crops. Amend Rule 23(c)(i) to a seven-year average. Delete Rule 23(b)(vi) Modify Rule 23(b)(viii) in relation to Lake Waituna. A better option would be to stipulate that Intensive Winter Grazing does not occur within 20m of the wetland reserve.
748.6	Southern View Ltd	Rule 23	Oppose	It is not workable for us in this economic climate to not be able to winter graze at home on our dairy properties and we are penalised as we have three properties neighbouring each other therefore we are then called a large operator. This is incorrect as when both our farms are of medium cow numbers for Southland 425 and 525. The farms are operated as separate entities, for example, cows are not changed between farms.
752.116	Southland Fish & Game Council	Rule 23(b)	Support in part	Amend Rule 23(b) to provide: “... (iii) Not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the Old Maitaura, <u>Riverine, Oxidising</u> or Peat Wetlands physiographic zones;  (iv) Not more than 50 hectares of intensive winter grazing is undertaken on a landholding within the <del>Riverine</del> , Gleyed, Bedrock / Hill Country, <del>Oxidising</del> , Central Plains, or Lignite-Marine Terraces physiographic zones; ... (vii) A vegetated strip is maintained, and stock <u>are</u> excluded <u>following cultivation of forage crops,</u> from the outer edge of the bed of any <u>headwater seep / spring, tarn, intermittent /</u>

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				<p><del>ephemeral streams with an active bed wider than 1 metre,</del> river, natural wetland, modified watercourse or artificial watercourse <del>for</del> <i>within</i> a distance of:</p> <p>(4) <del>3</del> <u>5</u> metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope of less than 4 degrees <del>(flat)</del> <u>or 10m measured horizontally from the outer bed of a natural wetland or watercourse with trout and / or Inanga spawning habitat on land with a slope of less than 4 degrees (flat);</u> and</p> <p>(5) 10 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope between 4 and 16 degrees <del>(rolling)</del>; and</p> <p>(6) 20 metres <u>measured horizontally</u> from the outer edge of the bed on land with a slope greater than 16 degrees <del>(strongly rolling)</del>; and</p> <p>(viii) The winter grazing does not occur within 100m of the outer edge of the bed of any lake or the Coastal Marine Area, <u>including Coastal Lagoons and Estuaries;</u></p> <p>(ix) Overland flow of run-off water does not cause a conspicuous <del>discolouration</del> <u>change in the colour or visual clarity, any significant adverse effects on aquatic life</u> or sedimentation of any adjacent waterbody.</p> <p>Amend Rule 23(c) to provide:</p> <p>(c) From 30 May 2018, the use of more than 20 hectares of a landholding for intensive grazing in the <u>Riverine, Oxidising, Old Matura</u>, or Peat Wetlands physiographic zones or 50 hectares in the <del>Riverine</del>, Gleyed, Bedrock / Hill Country, <del>Oxidising</del>, Central Plains or Lignite-Marine Terraces physiographic zone is a restricted discretionary activity, provided the following matters are met . . .</p> <p>...</p> <p><b><u>Environment Southland will restrict the exercise of its discretion to the following matters:</u></b></p> <p>...</p> <p>2. <del>The proposed</del> Management practices to <del>minimise</del> <u>avoid, remedy or mitigate</u> the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</p> <p>...</p>



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				<p>4. The potential <u>and adverse effects</u> <del>benefits</del> of the activity to the applicant, the community and the environment, <u>including the sensitivity of the receiving environment</u>;</p> <p>Amend Rule 23(d) to provide:  “(d) From 30 May 2018, the use of land for intensive winter grazing in the <u>Riverine, Gleyed, Bedrock / Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces</u> physiographic zones that do not meet condition (i), or (v) to (ix) of Rule 23(b) or condition (i) to (iii) of Rule 23(c) is a discretionary activity.”</p> <p>Amend Rule 23(e) to provide:  “(e) From 30 May 2018, the use of land for intensive winter grazing in the <u>Riverine, Oxidising, Old Mataura or Peat Wetlands</u> physiographic zones that do not meet conditions (i) to (iii) of Rule 23(c) is a non-complying activity.</p> <p>Amend Rule 23(g) to provide:  “...  <b><u>Environment Southland will restrict the exercise of its discretion to the following matters:</u></b>  ...  4. <del>The proposed</del> Management practices to <del>minimise</del> <u>avoid, remedy or mitigate</u> the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</p> <p>5. The potential <u>and adverse effects</u> <del>benefits</del> of the activity to the community and the environment, <u>including the sensitivity of the receiving environment</u>;</p>
759.12	Springlands Group Ltd	Rule 23	Oppose	<p>We propose a percentage based approach as per the draft copy of the PSWLP on the basis that it is a fairer measure and will be more reflective of each property, thus we propose 20 % threshold as a permitted activity. Clarify the management of multiple Physiographic Zones in the PSWLP.</p> <p>We seek clarity of what a land use consent may look like, the likely duration, and the requirements to continue intensive winter grazing in future. We seek that Rules 23(b) to 23(f) apply from 30 May 2020.</p>
760.5	St Patricks Farms Ltd	Rule 23	Amend	This would be more acceptable as a percentage of farmed land.

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761.11	STALKER Hanna & Callum	Rule 23	Oppose	There needs to be an exception added for B (ix) to allow for adverse weather events. We support management plans in accordance with appendix N to be supplied to ES in lieu of consents. We recommend that Rule 23 is revised and any reference to any area is removed.
762.7	STANLEY Karen	Rule 23	Amend	Amend to: High risk zone – 40% intensive grazing, Other zone – 50% intensive grazing. No consent – Part of Farm Management Plan Critical source areas to be managed as farm environmental management plan.
765.3	Stenkoll Farms Ltd	Rule 23	Oppose	The wintering of a farm business's own stock should be a permitted activity. Avoidance of consenting process.
766.6	STEVENS Brendon	Rule 23(b)(iii)	Amend	Amend 23(b)(iii) to a percentage based approach as per the draft Land and Water Plan. A proposed 20-25% threshold as a permitted activity. Amend 23(b)(vi) to add “known” into the sentence so it reads “the location of any <u>known</u> sub-surface drains...” The buffer zones implemented in Rule 23(b)(vii) be sufficient for duck ponds/sediment traps.
767.7	STEVENS David	Rule 23	Oppose	Delete.
768.12	STEVENSON Audrey	Rule 23	Oppose	No hectare limits are set.
769.2	STEVENSON G V & B P	Rule 23	Amend	Put on a percentage land – 15 – 20% of farm. Buffer of 3 metres when Intensive Winter Grazing.
770.2	STEWART Family Trust (David Stewart)	Rule 23	Oppose	Change intensive winter grazing to a maximum of 15% of the total farm size.
771.13	STEWART Family Trust (Trevor Stewart)	Rule 23	Amend	For properties over 300 hectares, the winter grazing threshold could be 15 percent of the total effective area. I propose that you only have to map new tile and mole drains.
771a.10	Grahame Stewart (Filwood Farm)	Rule 23	Oppose	I propose to map only new or upgraded tile drains within winter grazing areas, not all tile drains.
772.3	STEWART Ronald	Rule 23	Oppose	This rule needs to be removed until such time investigations on all zones have been actually performed and proven in full and non-complying needs to be removed. Wording needs changed to allow for more than one zone on a landholding to allow for increase in intensive grazing. Compensation needs to be paid for the devaluing in business farming the land. The use of land to intensively graze your own stock that live on property for

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				75% of the year without a consent.
773.6	STEWART Rory	Rule 23	Oppose	<p>Non complying needs removed, no resource consent required to feed your own stock that live on property for 75% of the year. Compensation needs to be paid to landowners and businesses farming the land for the devaluing of land and business by at least 30%. Wording of this rule needs changed to allow for an increase if two or more zones exist on the landholding.</p> <p>This rule needs to be removed until fully proven investigations on all zones have been accurately performed and non-complying needs to be removed.</p>
774.6	STEWART Vanessa	Rule 23	Amend	<p>For properties over 300 hectares, the winter grazing threshold could be 15 percent of the total effective area.</p> <p>I propose that you only have to map new tile and mole drains.</p> <p>Make it simpler and consult more with farmers. Make it less of a financial burden on the farmers.</p>
775.5	Stoney Creek Station Ltd	Rule 23	Oppose	<p>Push out the date to 2025 to align with the NPS-FM. Remove the condition relating to Farm management plans and replace with encourage. Amend (b)(iv) to the greater of 50 ha or 20% of total property. Remove rule (b)(vii) 2&amp;3. Amend (b)(vii) 1 to remove any references to slope. Amend rule (b)(vi) to require mapping of any new or redeveloped drains only.</p>
777.7	STRATFORD Chris & Lynsey	Rule 23	Oppose	<p>If we need a cap on the area of intensive winter grazing, surely a % based cap would be fairer?</p> <p>The requirement to map all drains should be limited to new ones, maintained existing ones, or known drains. The location of drains is not always known.</p> <p>The rule should be redrafted to clarify that the use of forage crops in Autumn (May) and Spring (August/Sept) for in-milk cows, is a permitted activity.</p> <p>Clarify which rules apply when there are multiple physiographic zones on the farm e.g. the rules of the physiographic zone being used for intensive wintering, rather than the rules of the riskiest physiographic zone on farm.</p> <p>Ideally, I think setting limits on wintering should be left until the limit setting process.</p>
778.1	Strathallan Farms Ltd	Rule 23	Oppose	<p>23(b)(iv) - replace 20/50 ha rule with a percentage of total landholding and a limit of nitrogen and phosphate that can be applied. 23(b)(vii) – account for soil moisture saturation levels. 23(c)(i) – provide a set of sensible protocols that can be used to use your land for winter</p>

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				grazing.
779.4	Strathallan Trust	Rule 23	Amend	Map of outlets of subsurface drains only. Rule 23(b)(iv): Replace 20/50ha rule with a percentage of total landholding and a limit of nitrogen & phosphate that can be applied. Rule 23(b)(vii): Account for soil moisture saturation levels Rule 23(c) (i): Provide a set of sensible protocols that can be used to use your land for winter grazing.
780.4	Strathfair Farms	Rule 23	Oppose Amend	Would 20/50 ha limits be better as a percentage. (10% or 15%) with management plans in place.
782.2	STRINGER Gay	Rule 23	Oppose	iv) You can't have a blanket size for intensive winter grazing to suit all farms - it should be a percentage of the land holding or related to the standard carrying capacity of the farm.
783.3	STRINGER Joe	Rule 23	Neutral	23(b)(v) How accurate is the area recorded to be? Farmers may use drills to measure area or GPS maps of area? Is there a standard on accuracy? 23(b)(vi) What happens for farms that have been purchased and have unmapped drains? 23(b)(vii) We personally have found Punga drains hand dug that are still working that could be 80+ years old. The 20m strip in 16degree land may be too far. If you have a man made ditch that runs the length of a long paddock, then you may lose several hectares of land or rule out paddocks from winter feed. 23(b)(ix) The flow of oils/rubber from sealed roads and the flow of mud from unsealed roads into water courses is this included in the discolouration? The overland flow from meandering rivers in flood events, is this taken into account where they eat away at riverbanks? Is there a default doc for a management plan? Open source? Have feral animal and birds been taken into account for discharge of faecal matter into waterways i.e. ducks, swans, geese  Environment Southland will restrict the exercise of its discretion to the following matters: 5. The proposed research to be undertaken and associated environmental effects, including methods and timing of publication. 6. Why is timing of publication important? Is this being used as PR or feel good driven? 7. What independent body is used for review verification of the ES process? 8. The potential benefits of the activity to the community and the environment. This view is biased. I would suggest changing the word "Benefits" to "effects".
784.1	Sunnyside Station	Rule 23	Oppose	Remove 50 ha limit and let farmers regulate what they deem is necessary for their own

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				personal situation
786.6	SUTHERLAND Kevin & Ann	Rule 23	Oppose	Amend to: Use an area based threshold for properties 300 hectares and under. And For properties over 300 hectares the winter grazing threshold could be 15 percent of the total effective area. And Only map new/upgraded or maintained drains within winter grazing areas. Not all tile drains.
787.4	SUTHERLAND Richard	Rule 23	Oppose	Do not agree with the limit at 50 hectares. This should be a percentage of a property as it is unfair on larger farms.
788.4	Switzer's Valley Transport	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
790.9	TAIT G R & J E & Waikawa Valley Trust	Rule 23	Oppose	Costly and time consuming. Oppose (b)(i) the imposed cost of establishing and maintaining a Management Plan. Suggest this be changed from 20 to 50ha to a percentage of land, 10% seems workable. (vi) Agree with the idea of mapping new or maintenance drains as a useful tool, but not existing drains. (ix) Very difficult in a flood or heavy rainfall situation to control water flowing overland! (c) Don't agree with cost and time associated with consenting. Generally farmers plant the same percentage of land each year for winter grazing – if the 20ha & 50ha rule is wiped and replaced with percentage then there should be no need for consent. If a farming practice changes dramatically i.e.; from sheep to dairy grazing or conversion – then consents would be relevant. (d-e-f) Oppose based on the difficulty with Physiographic Zone interpretation.
791.4	TALBOT Jeanette	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
792.25	TAYLER Matthew	Rule 23	Oppose	<ul style="list-style-type: none"> <li>• Rule 23(b)(iii) and Rule 23(c) be amended to “not more than 20% of a landholding.”</li> <li>• I propose 30 May 2019 as the time frame in Rule 23.</li> </ul>

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				<ul style="list-style-type: none"> <li>As an alternative to Rule 23(b)(vii) I propose 0-8 degrees 3m setback; thereafter setback = slope less 5 i.e. 10 degree slope = 7m setback etc.</li> <li>Rule 23(b)(iii) – clarified so landholding replaced with zone.</li> <li>Rule 23(b)(iii) – 100m of coastal marine area should be amended to 20m to reflect minor effects resulting.</li> </ul>
793.4	TAYLER Phillip	Rule 23	Oppose	Fifty ha threshold is a blunt measurement. Twenty percent of landholding would be a better measure of impact/intensity. Should be a recognition of the different impact of sheep/small cattle grazing versus large cattle.
794.1	TAYLOR C B & S I	Rule 23	Amend	We think that the formula to plant winter crop should be calculated from stock units/number of cows, not a per farm basis as there are a lot of large wintering operations in our area. We calculate 30% of total number of cows equates to the number of hectares required to plant fodder crops (i.e. 2,500 cows is 75Ha).
795.2	TAYLOR George	Rule 23	Amend	Some flexibility is required. Discolouration of waterways in times of high rainfall should not potentially be an offence.
796.4	TAYLOR Marcy	Rule 23	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
797.40	Nga Runanga and TRONT	Rule 23	Support in part	<p>Ensure that where a hectare limit trigger is used within a permitted activity rule in rules 20-23 the limit set is reflective of the attributes of the Physiographic Zone.</p> <p>Retain Rule 23(a) and amend Rule 23(b) as follows:</p> <p>(b) From 30 May 2018, the use of land for intensive winter grazing is a permitted activity, provided the following conditions are met:</p> <p>...</p> <p>(iii) not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the <del>Old Maitara</del> or Peat Wetlands physiographic zones;</p> <p><u>(iv) the intensive winter grazing does not take place within the Old Maitara physiographic zone....</u></p> <p>(c) From 30 May 2018, the use of more than 20 hectares of a landholding for intensive winter grazing in the Old Maitara, <u>Oxidising, Riverine, or Peat Wetlands</u> physiographic</p>

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				<p>zones or 50 hectares in the <del>Riverine</del>, Gleyed, Bedrock/Hill Country, <del>Oxidising</del>, Central Plains or Lignite-Marine Terraces physiographic zone is a restricted discretionary activity, provided the following conditions are met:...</p> <p>(d) From 30 May 2018, the use of land for intensive winter grazing in the Riverine, Gleyed, Bedrock/Hill Country, <del>Oxidising</del>, Central Plains, or Lignite-Marine Terraces physiographic zones that does not meet condition (i), <del>(ii)</del>, or (v) to (ix) of Rule 23(b) or condition (i) to (iii) of Rule 23(c) is a discretionary activity....</p> <p>(e) From 30 May 2018, the use of land for intensive winter grazing in the Old Mataura, <del>Oxidising</del>, or Peat Wetlands physiographic zones that does not meet conditions (i) to (iii) of Rule 23(c) is a non-complying activity.</p> <p>Retain (f) and (g) as worded.</p>
798.7	TEMPLETON Luke	Rule 23	Oppose	<p>Equitable ruling for all property sizes.</p> <p>Avoidance of consenting process within limits.</p> <p>Clarify ruling for properties with mixed physiographic zones –</p> <p>Why should a consent be required to increase winter grazing by more than 20 ha if it occurs within the proposed hectare limits?</p> <p>How is the three-year average to be calculated? From which base year?</p> <p>All references to areas or percentages of land holdings to be removed from the plan.</p> <p>There needs to be an exception added for (b)(ix) to allow for adverse weather events.</p>
799.8	TEMPLETON Peter	Rule 23	Oppose	<p>I recommend that Rule 23 is revised and any reference to any area is removed. I support management plans in accordance with appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for B (ix) to allow for adverse weather events.</p> <p>I recommend that the sub rule excluding intensive winter grazing from within 100m of the Coastal Marine Area be removed from the plan. Farm Plans (Appendix N) are ideally suited to manage risks and mitigate effects from these activities.</p>
800.5	TEMPLETON Vaughan	Rule 23		<p>The 20 and 50 ha limits on land holdings are arbitrary and are quite limiting to large land owners. There should be an option of 15-18% of the land holding.</p> <p>Delete 23(viii).</p>
801.3	Terrace Farm Trust & Johnrey Trust	Rule 23	Amend	<p>My preference is to see people operating any size farm under good management practices.</p> <p>Would prefer the word “know” to be added to 23(b)(vi)</p> <p>A simple practical formula, with scientific backing should be developed and replace the current setback angles om 23(b)(vi).</p>

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802.26	The 254 Partnership & Gerken Family Trust	Rule 23	Oppose	If Ha limits remain it will drive bad practice. Remove “Landholding from the plan and replace with “Title”. Include GMP in farming. GMP should include stock class. Cows should not be wintered on heavy soils.
803.41	The Fertiliser Association of NZ	Rule 23	Support in part Amend	<p>Delete Rule 23 and replace with the following:</p> <p><u>Rule 23A</u> Until 30 May 2018, the use of land for intensive winter grazing is a permitted activity.</p> <p><u>Rule 23B</u> From 30 May 2018, the use of land for intensive winter grazing is a permitted activity, <u>provided the following conditions are met:</u></p> <p>(i) <u>a Farm Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants;</u></p> <p>(ii) <u>no intensive winter grazing is undertaken in the Alpine physiographic zone;</u></p> <p>(iii) <u>not more than 20 hectares of intensive winter grazing is undertaken on a landholding within the Old Maitava, or Peat Wetlands physiographic zones;</u></p> <p>(iv) <u>not more than 50 hectares of intensive winter grazing is undertaken on a landholding within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones;</u></p> <p>(v) <u>the area of land used for intensive winter grazing is recorded for each year and provided to Environment Southland on request;</u></p> <p>(vi) <u>the location of any sub-surface drains within the area of land used for intensive winter grazing, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request;</u></p> <p>(vii) <u>a vegetated strip is maintained, and stock excluded from, the outer edge of the bed of any river, wetland, modified watercourse or artificial watercourse for a distance of:</u></p>



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				<p>(1) <u>3 metres from the outer edge of the bed on land with a slope of less than 4 degrees; and</u></p> <p>(2) <u>10 metres from the outer edge of the bed on land with a slope between 4 and 16 degrees; and</u></p> <p>(3) <u>20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees; and</u></p> <p>(viii) <u>the winter grazing does not occur within 100 m of the outer edge of the bed of any lake or the Coastal Marine Area;</u></p> <p>(ix) <u>Industry Agreed Good Management Practices are used where practicable to address the risk of overland flow or run-off water to any adjacent water body.</u></p> <p><u>Rule 23C</u></p> <p>(a) <u>From 30 May 2018, the use of more than 20 hectares of a landholding for intensive winter grazing in the Old Maitaura, or Peat Wetlands physiographic zones or 50 hectares in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces physiographic zone is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>(i) <u>the area of land used on the landholding for intensive winter grazing has not increased beyond the area of land used, averaged over the previous three years;</u></p> <p>(ii) <u>conditions (v) to (ix) of Rule 23B are met; and</u></p> <p>(iii) <u>a Farm Management Plan has been prepared in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland..</u></p> <p>(b) <u>Despite Rule 23A to F the use of land for intensive winter grazing is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>(i) <u>the activity occurs on those parcels of land wholly contained with Computer Freehold Registers SL134/119, 307310, 307311, SL198/159, and SL151/191; and Lot 5 DP 376415 as contained in Computer Freehold Register 307305, and Lots 6 and 7 DP 376415 and Part Lot 8 DP 376415 as contained in Computer Freehold Register 307307;</u></p> <p>(ii) <u>the primary purpose of the activity is to contribute to publicly available research on</u></p>

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				<p><u>the mitigation of environmental effects of dairy farming or wintering;</u></p> <p><u>(iii) a Farm Management Plan is prepared and implemented in accordance with Appendix N including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland.</u></p> <p><u>Environment Southland will restrict the exercise of its discretion to the following matters, as relevant:</u></p> <ol style="list-style-type: none"> <li>1. <u>the quality of, compliance with and auditing of the Management Plan;</u></li> <li>2. <u>the proposed management practices to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</u></li> <li>3. <u>the quantum of and timing of any reductions in the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land;</u></li> <li>4. <u>the potential benefits of the activity to the applicant, the community and the environment;</u></li> <li>5. <u>the potential effects of the land use on surface and groundwater quality and sources of drinking-water.</u></li> <li>6. <u>the proposed research to be undertaken and associated environmental effects, including methods and timing of publication.</u></li> </ol> <p><u>An application for resource consent under Rule 23C will be processed and considered without public or limited notification unless the applicant requests notification or Environment Southland considers special circumstances exist that warrant notification of the application.</u></p> <p><u>Rule 23D</u></p> <p><u>From 30 May 2018, the use of land for intensive winter grazing in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones that does not meet condition (i), or (v) to (ix) of Rule 23B or condition (i) to (iii) of Rule 23C is a discretionary activity.</u></p> <p><u>Rule 23E</u></p> <p><u>From 30 May 2018, the use of land for intensive winter grazing in the Old Maitava or Peat Wetlands physiographic zones that does not meet conditions (i) to (iii) of Rule 23C(a) is a</u></p>

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				<u>non-complying activity.</u> <u>Rule 23F</u> <u>From 30 May 2018 and despite any other rule, the use of land for intensive winter grazing within the Alpine physiographic zone is a prohibited activity.</u>
804.1	The Mahoe Trust	Rule 23	Amend	Rather than 20 – 50ha the rule should be up to 25% of each farm total area. Providing all best practice measures within the Farm Management Plan have been carried out, the Farm Manager is not liable for overland flow or run off water that causes discolouration or sedimentation of a waterbody
807.5	The Terraces Ltd	Rule 23	Oppose	Push out the date to 2025 to align with the NPS-FM. Remove the condition relating to Farm management plans and replace with encourage. Amend (b) (iv) to the greater of 50ha or 20% of total property. Remove rule (b) (vii) 2 & 3. Amend (b) (vii) 1 to remove reference to slope. Amend rule (b) (vi) to require mapping of any new or redeveloped drains only.
810.35	Three Rivers Catchment Group (TRCG)	Rule 23	Oppose	Amend to percentage based rule based on 20% of the effective area of the landholding. Seek amendments sought to Rule 23(b) if the rule is not changed to a percentage based rule: (iii) <u>No more than 50ha total of intensive winter grazing is undertaken on a landholding.</u> (1) <u>No more than 20ha of intensive winter grazing is to be undertaken within the Old Maitauna and Peat Wetlands physiographic zones within a landholding.</u> (2) <u>No more than 50ha of intensive winter grazing is to be undertaken within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains or Lignite-Marine Terraces physiographic zones within a landholding.</u>
811.20	THYS Herman & STAUT Tinneke	Rule 23	Oppose	Make wintering rules outcome based.
812.4	TIDEY Allan	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
813.7	Tihaka Farms	Rule 23	Oppose	We suggest that this Rule is removed from the draft plan. We suggest that the buffer's widths be reduced to 5m is sufficient for slopes greater than 16 degrees; and the buffer widths be reduced proportionately for slopes less than 16 degrees.
814.6	Timothy Farms Ltd	Rule 23(b)(ix)	Oppose	Surely if farmers are adhering to the management plan this rule would be unnecessary?
815.3	Timpany Investments Ltd	Rule 23	Oppose	Delete.

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816.5	TIPPETT Christie	Rule 23	Oppose Amend	Amend the rule to allow for 15% of the effective area of a landholding to be used for intensive winter grazing. Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope.
817.23	Tomogalak Gorge Trust (Jeffery Keen)	Rule 23	Amend	We would like it to be reworded or amended to be a specific percentage of total farm area and /or percentage of capital stock wintered e.g. 5000su = 6% winter grazing and anything above 50ha triggers a consent.  Amend to show only <u>outlets</u> on any maps required, not depths either. If required outlets can be checked for nutrient loss  Amend 23(b)(6) to “have to provide reference of outlets.” Not depths and all drains. If required outlets can be monitored.
818.24	Tomogalak Gorge Trust (John Keen)	Rule 23	Amend	Reword or amend to be percentage of total farm area and/or percentage of capital stock wintered e.g. 5000 su = 6% winter grazing and anything above this triggers a consent requirement.  Amend 23(b)(6) to show only outlets on any maps required, not depths either. If required outlets can be checked for nutrient loss.
819.22	Tomogalak Gorge Trust (Linzi Keen)	Rule 23(b)	Amend	Amend to show only <u>outlets</u> on any maps required, not depths either. If required outlets can be checked for nutrient loss.  We would like Rule 23(b)(iv) to be reworded or amended to be a specified percentage of total farm area and/or percentage of capital stock wintered e.g. 5000 su = 6% winter grazing and anything above this triggers a consent requirement
820.9	TOPHAM Jeanette	Rule 23	Oppose	Intensive wintering should be on nutrient input and what mitigating factors can be used to limit contaminants entering waterways. ES and farmers need time to know what nutrient loading a waterway can sustain, rather than area based. This will be needed for limit setting. Combine (b)(iii) and (b)(iv) to allow 50ha of wintering area in all zones per farm annually, but if on a peat soil type, only 20ha can be peat with the balance in other soil types. B this is a permitted activity  Intensive wintering on forage crops or grass should be a permitted activity if a management plan has been prepared in accordance with Appendix N and is supplied to ES from 30 May 2018.
821.4	TOSH David	Rule 23	Oppose	No specific decision requested.
822.4	Tremaine Farming Partnership	Rule 23		If there is mixed PZ on the land to be winter grazed-farmer can choose which PZ it is regardless of the land area of each PZ in the area/paddock to be winter grazed.  A percentage based approach to when resource consent will be required would be more

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				suitable and practical for larger farms who winter their own stock. 20% for each landholding would be suitable to cover most farmers grazing their own stock and would still mean graziers who are solely winter grazing operations would need to obtain a consent. There should be no difference in size of area permitted to be grazed between the PZ's. Remove Rule 23 (c) (i).
824.5	Tulloch Farm Glendhu Ltd	Rule 23	Oppose	Amend the date to 2025 to align with the NPS-FM and remove the condition relating to Farm Management Plans and replace with encourage. Amend (b)(iv) to the greater of 50 ha or 20% of the total property. Remove (b)(vii) 2 and 3. Amend (b)(vii) 1 to remove reference to slope. Amend (b)(vi) to require mapping of any new or redeveloped drains only.
825.5	Tulloch McNab Transport Ltd	Rule 23	Oppose	Push out the date to 2025 to align with the NPS-FM and remove the condition relating to Farm Management Plans and replace with encourage. Amend (b)(iv) to the greater of 50 ha or 20% of the total property. Amend Rule (b)(vi) to require mapping of any new or redeveloped drains only. Delete Rule (b)(vii)(2) and (3). Delete references to slope in (b)(vii)(1).
826.3	TURNER Jonny	Rule 23	Oppose	The 50ha and 20ha rules make winter grazing unviable for farmers – delete. Also I believe the council needs to differentiate between different animals and crop types.
827.5	TURNER Paul & Kayleen	Rule 23	Oppose	Any reference to area in rule 23 must be removed. We are supportive of the Management Plans in accordance with appendix N and that the winter management plan part of these be 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. There must be a new category between permitted activity and a consent. Which I would suggest a visit from a land sustainability team member. This would greatly reduce the need for consents.
828.3	Twin Farm Ltd	Rule 23	Amend	Amend Intensive Winter Grazing thresholds to 15% of a farm, with no more than 5% of Old Mataura being Intensively Winter Grazed.
828.4	Twin Farm Ltd	Rule 23	Amend	The limitations on the Old Mataura physiographic zone should not impact the other physiographic zones within a landholding. If you own land with a portion of Old Mataura on it, the Old Mataura zone can be treated as such, but the remainder of the farm should be treated as per the other physiographic zones and completely disregarding the fact that the landholding also contains some Old Mataura.
829.1	Unity Farm Ltd	Rule 23 (vii)	Oppose	Slope categories too broad. Fencing of vege strip of exclusion of stock for 4° and a 16° slope

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		(1),(2),(3)		same is unfair, should be more steps e.g. 4°=3M, 6°=4M, 8°=5M...16°=10M. Fencing off for vege strip and exclusion of stock being at 4° is too harsh. I can understand the process starting at 8° point and moving from there.
830.5	Upper Aparima Catchment Group	Rule 23	Oppose	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.
831.3	VAN DER BIJL Willem	Rule 23	Oppose	Replace part of rule that places an area limit on wintering stock and base this according to a good 'farm plan'.
832.84	VAN GOOL Raewyn	Rule 23	Oppose in part	Retain Rule 23(a) and (b)(i), Delete Rule 23(b)(vi) and (vii) If Rule 23(b)(ix) was to remain, it needs to exempt extreme weather condition.
833.5	VAN ROOIJEN Marcel	Rule 23	Oppose	We don't believe that giving an arbitrary number on area will have any positive impact on water quality. Retain 23(c) and (d) Rule 23(e) and (f): Farmers should be given a ten year transition time to change farming practices where this will require a change in farming practices and or have a significant financial impact.
832.85	VAN GOOL Raewyn	Rule 23(g)	Support	Retain.
834.4	VAN ROSSUM Winy & Maarten	Rule 23		We would recommend to use a percentage of total winter grazed area. We propose that a maximum of 30% of an "individual farm", as classified by the legal description of the land, would be used for all physiographic zones.
835.4	VAN ZYL Hendrik	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.4	VAN ZYL Michelle	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
837.2	Venlaw Ltd	Rule 23	Amend	Amend to approx. 15-20% of effective farm area
840.7	W & B Clarke & Son Ltd	Rule 23		23(b)(iii)&(iv): There needs to be some clarification around this in the situation where a

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				landholding is within more than one physiographic zone. The Maximum grazing areas simply do not work for large land holdings with high stock numbers where the restricted area may simply not be enough to feed their stock. We recommend this is changed to a percentage of total landholding somewhere around 10 – 15 % would be far more appropriate. 23(b)(vii): We propose a setback of 3 meters as per the status quo remains for all slopes.
842.7	Waihoaka Holdings Ltd	Rule 23	Oppose	Delete. However, if the rule is retained, we suggest that the buffer's widths be reduced to 5m is sufficient for slopes greater than 16 degrees; and the buffer widths be reduced proportionately for slopes less than 16 degrees.
843.5	Waikaia Plains Ltd	Rule 23	Oppose Amend	This would be more acceptable as a percentage of farmed land.
844.3	Waitea Dairies Ltd	Rule 23	Oppose	Allow farmers to continue their own good farming practices. Common sense needs to prevail.
845.3	WALLACE Bruce & Maree	Rule 23	Oppose Amend	This should be percentage based e.g. 18%.
846.2	WALSH Brian	Rule 23	Oppose	A better idea would be % of farm recommend 20% winter crops slope degrees is too low.
847.1	WALSH Kerri	Rule 23	Oppose	Amend to 25% of farm possibly.
849.2	WARNOCK Barry	Rule 23	Oppose	Amend the 50 hectare and 20 hectare area, should be on a percentage over 300 hectares. It should be 15% as not to disadvantage larger landholders. Oppose the average of three years as it doesn't allow for changes in farming management. Oppose blanket rule, distance from bank needs to be based on best farm practise as some creek banks are higher than the surrounding paddock.
854.3	WELLER Grant & Bernie	Rule 23	Amend	Amend to 10% or 15% of threshold for land area in winter grazing.
855.1	WELLS A R & J R Family Trust	Rule 23	Amend	Amend Rule 23(b)(iii) Old Mataura /Peat 20ha applies to the first 300 ha then add extra 5% for every hectare above 300ha. Amend Rule 23(b)(iv) Gleyed/Oxidising 50ha applies to the first 500ha then add extra 5% for every hectare above 500ha.
856.5	West Range Farms Ltd (Bronwyn Chamberlain)	Rule 23	Oppose	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 suggest that 25% of the landholding should be eligible for winter cropping, anymore than this requiring consent.
857.5	West Range Farms Ltd (Derek Chamberlain)	Rule 23	Oppose	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 suggest that 25% of the landholding should be eligible for winter cropping, anymore than this requiring consent.

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858.1	Westend Station	Rule 23	Oppose	Intensive winter grazing should be a permitted activity. If a management plan is prepared and implemented as in (b)(i) there is nothing to be gained by having to go through the consent process. The 15% figure of the total land area of the farm quoted in the draft would be fairer and a much better indicator of intensive winter grazing. An area of greater than 15% could be signed off by the land sustainability team if it fits within the management plan and complies with existing rules.
859.4	WHITE Family Trust	Rule 23	Amend	Should be able to graze 50ha total on your whole property i.e. 20ha peat plus 30ha other land = 50ha.
860.3	WHITE John (Richard)	Rule 23	Amend	Amend 23(b)(vii) to: <ul style="list-style-type: none"> <li>• Retain</li> <li>• 5 metres from ..... With a slope between 4 &amp; 10 degrees</li> <li>• 10 metres from ... with a slope between 10 &amp; 16 degrees</li> <li>• 20 metres from .... With a slope greater than 16 degrees.</li> <li>•</li> </ul> Amend 23(b) (iii) and (iv) to read no more than 20% of a landholding up to a maximum of 100 Ha, is to be undertaken for intensive winter grazing within the .....soils).
861.21	WHITE John Copeland	Rule 23	Oppose	We recommend that Rule 23 is revised and any reference to any area is removed. We support management plans in accordance with appendix N to be supplied to ES in lieu of consents. There needs to be an exception added for b(ix) to allow for adverse weather events. I recommend the buffer for coastal marine areas should be the same as any other waterway.
862.3	WHITE Malcolm & Pauline	Rule 23	Oppose	We do not agree with the restriction of 20ha or 50ha per property.
863.2	Whiterig Dairy Farm	Rule 23	Neutral	The area allowed for cropping appears unfair for larger farms. What are the costs to apply for consent to plant more crop? Stress related to the uncertainty. A new calculation should be considered possible linked with stock rate or a % of land holding.
864.6	Whyte Partnership	Rule 23	Amend	Remove requirement for a management plan and mapping of subsurface drains. The amount of ground allowed for winter cropping should be based on a percentage of the landholding. Reduce setback amount for sloping ground. Increase the average of farming practices to more than the last three years.
865.5	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 23	Amend	To allow intensive grazing of each physiographic zone on each property to the recommended area e.g. if your farm has Old Mataura and Gleyed zones then 20ha of the Old Mataura zone can be intensively grazed and 50ha of the Gleyed zone can be grazed.
867.4	WILKINS Donna	Rule 23		Delete all farming restrictions based on Physiographic zones. Delay regulation until Good



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				Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
868.18	Wilkins Farming Ltd	Rule 23	Oppose	<p>It should be done as a percentage of your total area i.e. 30-40% would mean that existing winter grazing businesses are not compromised.</p> <p>Rule 23(c)(i): Grand parenting should be confined to those who are already performing an activity beyond any regulatory limits. Those beginning a new activity or wishing to increase an activity on a farm should be allowed the opportunity on a case by case effects based basis using relevant due diligence factoring in all environmental, economic and social perspectives.</p> <p>Rule 23(viii): A lake should be a known named lake i.e. Lake Te Anau. A duck pond should not be defined as a lake and a practical setback i.e. 3m should be applied as far as cultivation is concerned.</p> <p>Rule 23 (b) (iii) &amp; (iv) Intensive Winter grazing should not be targeted and should not be assessed independently to any other form of land use. These should be assessed on a case by case basis be it dairy, sheep &amp; beef, deer, vegetables or tulips.</p> <p>“Old Mataura” zone should be in the same consent category as riverine, gleyed, oxidising, central plains, lignite marine terraces and bedrock/hill for new or expanded dairy farming. No regulation to be imposed until science is proven that regulation will achieve a better outcome than a concentration on best practise farm policies would.</p> <p>IF regulation is necessary it could be linked to water quality and nutrients typically leached (if any) proven with a scientific method similar but not limited to the Overseer model. Any restrictions should be applied once due diligence has been achieved such as a comprehensive cost benefit analysis of economic and social costs vs environmental benefits.</p>
869.6	WILKINS Pam	Rule 23	Oppose	Intensive winter grazing should be a permitted activity under best management practices. The use of physiographic zones should not be used to define farming practices.
871.4	WILLANS Murray & Tarn	Rule 23	Oppose	If the practice of intensive winter grazing requires limiting, then do this by way of a percentage of the entire area of the farm. This condition of Rule 23 b is impossible to meet in an extreme rain event so cannot be included as a condition of the winter grazing rule.
873.4	WILLIAMSON James	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and

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				cultural viewpoints.
874.2	WILLIAMSON Rodney	Rule 23(b)(iv)	Oppose	Leave this as status quo or make it based on an average of the crop area grown in the last three years.
875.5	Willowbank Farms 2015 Ltd & Avondale Dairies	Rule 23	Oppose	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.
876.2	Wilriskit Ltd	Rule 23	Amend	Opposed to Ha limit this needs to relate to total landholding and also needs to relate to total KgDM and total live weight per hectare.
877.48	WILSON Aaron	Rule 23	Oppose in part	FMPs, should be the cornerstone of this W&L plan and take precedence over a consenting regime. Present and explain the science behind the restriction of intensive winter grazing to 20ha and 50ha. Change rule 23(ii) (iv) to a percentage based rule of 20%. Rule 23(v) (vi) should not sit in the rules but be part of FMPs. Rule 23(2) (3) need to be simplified to avoid unnecessary confusion. Rule 23(viii) should be taken on a case by case basis and be reflected in individual FMPs. Rule 23(c)(1) needs to be clarified. Who or whom is to work out the average area of land used for intensive winter grazing? All PZs need to be treated with an even hand so no one PZ is materially disadvantaged over another.
878.3	WILSON Douglas	Rule 23	Oppose	Exclude sheep. The science behind physiographic zones needs more testing. Remove requirement to map existing drains and outlets.
879.3	WILSON Kerry	Rule 23	Oppose	Duck ponds and other wetlands will be drained to get around this and these are our sediment traps. It is a ridiculous distance and should be managed in a sensible way within the management plan. Amend to exclude green feed oats after a grain harvest.
880.52	WILSON Shannon	Rule 23	Oppose in part	FMPs should be the cornerstone of this W&L plan and take precedence over a consenting regime. Present and explain the science behind the restriction of intensive winter grazing to 20ha and 50ha. Change rule 23(ii) (iv) to a percentage based rule of 20%. Rule 23(v) (vi) should not sit in the rules but be part of FMPs. Rule 23(2) (3) need to be simplified to avoid unnecessary confusion. Rule 23(viii) should be taken on a case by case basis and be reflected in individual FMPs. Rule 23(c)(1) needs to be clarified. Who or whom is to work out the average area of land used for intensive winter grazing? All PZs need to be treated with an

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				even hand so no one PZ is materially disadvantaged over another.
881.3	Windyridge (Fleming) Ltd Farm	Rule 23	Oppose	Delete Rule 23(b)(vii). Amend 23(c): Consider the size of each landholding and work out a percentage of each property.
882.2	WING D R & H M	Rule 23	Amend	Rule 23(b)(iv): If there is to be a restriction, then it should be a percentage of the landholding. Fifteen % for everyone should be the minimum percentage allowed. It is the intensive water grazing of stock brought onto a property just for winter, therefore extra to the normal stocking rate, that should have any controls placed around them.  Rule 23(b)(ix): Effects of normal weather can be mitigated, any rules placed around overland flow of run-off water should take cognisance of an unusual weather event which is impossible to predict, therefore impossible to guard against. The same consideration should be made if an abnormal weather event occurred at any time of the year.  Rule 23(b)(vi) Only the outlets of tile drains need to (and can) be inspected, if that is a requirement, without extra expense to the landholder.
883.2	WING Darren & Jenny	Rule 23	Amend	I think the specific limit of 20/50ha should be altered to a percentage of total farm area such as 25%. This would allow our own capital stock to be wintered and any area over 25%. Say over 25% of total area would indicate outside stock coming onto a farm for a short period of time, increasing risk to land and water. Keep the current best practice of 3m from the top of the bank for vegetation buffer. Instead of indicating the exact location of tile drains, locate the outlets into the waterways and monitor these.
884.4	WINTER Amy	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
885.3	WINTER Graham & Robin	Rule 23		Replace the 20-50ha limits with a percentage criteria so less fertile land, more percentage of total farm permissible.
887.1	Woodslea Downs Farm Ltd	Rule 23	Oppose	More detail needed for definition of forage crop. Limits set on intensive winter grazing should be relative to the size of farm.
888.9	WOOLHOUSE K A & J A	Rule 23	Oppose	Delete.
889.4	WRIGHT David	Rule 23	Oppose	Delete intensive winter grazing, should be based on water quality tested at farm source.

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890.4	WRIGHT Lindsay Family Trust	Rule 23	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
892.4	YOUNG A R & R B Partnership (Andrew Young)	Rule 23	Oppose	For properties over 200 ha a more acceptable winter grazing threshold could be 20% of the total effective area. Reduce vegetative buffer zone in low risk areas as assessed by Farm Environment Plan.
893.4	YOUNG A R & R B Partnership (Roseanne Young)	Rule 23	Oppose Amend	Map only new or upgraded drains. Reduce vegetative buffer zone in low risk areas as assessed by Farm Environment Plan. For properties over 200Ha a more acceptable winter grazing threshold could be 20% of the total effective area.
894.2	YOUNG Robert	Rule 23	Oppose	Rule 23(b)(iv) A winter grazing limit that blends the current and previous proposals. A limit of 20% of the landholding area, or 20ha, whichever is larger. Rule 23 b (vii) Setbacks. Slope less than 4 degrees 3 metres, 4 to 10 degrees 5 metres, 10 to 16 degrees 10 metres and 16 to 20 degrees 20 metres. Rule 23 (c) (i) Winter grazing should only be limited by the rules for the particular geographical zone, not by previous land use.

#### Rule 24 – Incidental discharges from farming

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.90	Aratiatia Livestock Ltd	Rule 24	Support	Retain.
108.82	BYTHELL Jesse	Rule 24	Support	Retain.
152.14	Clover Bell Ltd	Rule 24	Support	Retain.
186.6	D R & J A E Pullar Ltd	Rule 24(a)	Support	Retain.
189.35	Dairy Holdings Ltd	Rule 24	Support	Retain
224.9	DUFFY Paul	Rule 24		The consent process needs to be straight forward, simple, not expensive for farmers and well explained.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
233.9	DYSON Valerie &Glyn	Rule 24	Support	Retain.
250.5	ESLER Lloyd	Rule 24	Support	Retain.
265.87	Federated Farmers of NZ (Southland Province)	Rule 24	Support in part	Delete.
279.70	Forest & Bird NZ	Rule 24	Support with amendment	Amend Rule 24 as follows: (a) The discharge of nitrogen, phosphorus, sediment or microbial contaminants onto or into land in circumstances where that may result in a contaminant entering water that would otherwise contravene Section 15(1) of the RMA is a permitted activity provide the following conditions are <del>is</del> met: (i) The land use activity is associated with the discharge is authorised under Rules 20, 21, 22 or 23; <u>and</u>  <u>(ii) The discharge does not reduce water quality below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the property boundary.”</u> (b) The discharge of nitrogen, phosphorus, sediment and microbial contaminants onto or into land in circumstances where that may result in a contaminant entering water that would otherwise contravene Section 15(1) of the RMA and does not comply with Rules 20, 21, 22 or 23 <u>or standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the property boundary</u> is a non-complying activity.”
313.6	GILLESPIE Maria	Rule 24	Support	Retain.
349.2	HAMILTON N J & R H & Manapouri Station	Rule 24	Oppose	Include allowance for heavy rainfall etc.
355.11	HARRIS David	Rule 24	Oppose	Delete.
368.4	HENDERSON Chris (Mrs)	Rule 24	Support	Retain.
402.12	HUNT Alistair & Bernadette	Rule 24	Support	Retain.
510.5	Mataura Butcher Shop Ltd	Rule 24	Oppose	Make permitted.
570.16	MILLER R L & S J Farm Trust	Rule 24	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
581.4	MORRIS Lenore	Rule 24 (a & b)	Oppose	Delete.
582.4	MORRIS Peter & Norina	Rule 24(a)&(b)	Oppose	There is to much restrictions.
598.5	Newton Slink Skins	Rule 24	Oppose	Make permitted.
640.38	Pourakino Catchment Group	Rule 24	Support Amend	(i) the land use activity associated with the discharge is authorised under Rules 20, 21, 22 or 23 <u>or under an approved resource consent.</u>
752.117	Southland Fish & Game Council	Rule 24	Oppose	Amend Rule 24(a) to provide: “(a) The discharge of nitrogen, phosphorus, sediment or microbial contaminants onto or into land in circumstances where that may result in a contaminant entering water that would otherwise contravene Section 15(1) of the RMA is a permitted activity provide the following conditions <del>are</del> <del>is</del> met: (i) The land use activity is associated with the discharge is authorised under Rules 20, 21, 22 or 23; <u>and</u> (ii) <u>The discharge does not reduce water quality below any standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the property boundary.</u> ” (b) The discharge of nitrogen, phosphorus, sediment and microbial contaminants onto or into land in circumstances where that may result in a contaminant entering water that would otherwise contravene Section 15(1) of the RMA and does not comply with Rules 20, 21, 22 or 23 <u>or standards set for the relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the property boundary is a non-complying activity.</u> ”
792.26	TAYLER Matthew	Rule 24	Amend	Additional condition under Rule 24(a) “discharge of nitrogen phosphorous or other fertilizers applied aerially onto land in circumstances that may result in a contaminant entering water is a permitted activity provided all practicable mitigation measures have been observed”.
810.36	Three Rivers Catchment Group (TRCG)	Rule 24	Support Amend	(i) the land use activity associated with the discharge is authorised under Rules 20, 21, 22 or 23 <u>or under an approved resource consent.</u>
811.21	THYS Herman & STAUT Tinneke	Rule 24	Support	Retain.
832.86	VAN GOOL Raewyn	Rule 24	Support	Retain.
877.49	WILSON Aaron	Rule 24	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.53	WILSON Shannon	Rule 24	Support	Retain.

### Rule 25 – Cultivation on sloping ground

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
1.3	A J & S R Currie Ltd	Rule 25	Oppose	Get a more realistic view on this one.
5.14	ADAMS A J & P G	Rule 25	Amend	Allow cultivation on sloping ground if it has already been cultivated before. Replace the need for resource consents by determining buffers that are appropriate for each property.
8.2	AFFLECK Christopher	Rule 25	Amend	<p>(i) Minimal tillage e.g. direct drilling is a permitted activity with a 3 metre setback and can be used on slopes steeper than 20 degrees.</p> <p>(ii) 3 metre setback up to 8 degrees; 5 metre setback up to 16 degrees and 10 metre setback over 16 degrees.</p> <p>(iii) Average slope can be calculated over 20 metre or 50 metre distance, whichever is the lesser average slope.</p> <p>(iv) Slopes greater than 20 degrees can be cultivated if there is more than 20 metres distance of slope less than 20 degrees to the edge of the required setback distance.</p>
9.1	AFFLECK Mairead	Rule 25	Amend	Remove 20 degree restriction and consult further with farmers to come to an agreement which is beneficial for the sustainability of the environment and for the benefit of farmers.
11.7	Agribusiness Consultants Ltd	Rule 25		<p>Delete Rule 25 and replace with a rule that retains the 3m grazing buffer and farmers are required to either:</p> <p>a) Graze toward the waterway.</p> <p>or</p> <p>b) Graze a 3-20m waterway buffer last.</p> <p>or</p> <p>c) Controlled activity.</p> <p>Waterway definitions should be improved to remove ephemerals and swales if such a rule was imposed. Further changes to such a rule could be made to include some swales, ephemerals in the future, as awareness and science around the management of these improves.</p>
14.5	ALLAN Frazer & Karen	Rule 25	Amend	There needs to be clarification around how this will be managed per paddock. Just the areas over a 20m distance and over 20 degree slope in each paddock? The whole paddock cannot

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>be cultivated if it contains a 20 degree slope? A percentage of the paddock cannot be cultivated if it contains a 20 degree slope?</p> <p>Increase the slope allowance to 28 degrees. Permitted activity where sustainable practice/s are included such as: cultivation round the hill, 20m buffer zone around the foot of the paddock. Graze from the top of the paddock down. Have a run-off paddock right next door so 3-4hr on crop then take off. Restricting the class of stock used to graze cultivated areas over 20 degrees. Use of a back fence and portable troughs. Give a ruling on how this exclusion will work per paddock e.g. if 70% of the paddock is over 28 degrees the paddock cannot be cultivated.</p>
19.6	Allison Family Farms Ltd	Rule 25		Amend the buffer zones to make them more practical – see submission for more details.
20.3	ANDERSON Robert	Rule 25	Oppose	No specific decision requested
22.3	Aparima Bridge Farm	Rule 25	Oppose	Clarify if 20 degrees is an average over a paddock.
24.91	Aratiatia Livestock Ltd	Rule 25	Support	Retain.
25.29	Ardel Dairies Ltd	Rule 25	Oppose	Change to 30 degrees and allow multiple cultivations over a 5 year period and reword with more definitions so the spraying of weeds is allowed.
26.12	Ardoyne Farm Dairys	Rule 25	Oppose	Delete restrictions for cultivation over 20 degree.
27.3	Arkley Farm Ltd	Rule 25	Support	<p>Retain Rule 25(b)</p> <p>0-10 degrees 3m setback, 10-20 degrees 5m setback &gt;20 degrees 10m setback. Also an allowance made for short hills vs tall hills.</p> <p>Amend to allow mechanical cultivation on land not greater than 25 degrees if over 100m long and one off cultivation of land up to 30 degrees with a length of no more than 100m be allowed for the purpose of development for safety.</p>
31.7	AYERS Warren	Rule 25	Amend	<p>Change 20 degrees to 30 degrees.</p> <p>Change 16 degrees to 30 degrees, and change 20 metres to 10 metres.</p>
33.6	BACON V M	Rule 25	Amend	Examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate to my property in partnership with Environment Southland, this would replace the need for resource consent.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
34.3	BAIRD A J & L S		Support	<p>Rule 25(a)(ii): Shouldn't be any lower but higher than 700m runs into a higher slope and sensitive waterways.</p> <p>Amend Rule 25(a)(ii) to "slope greater than 25 degrees".</p> <p>Rule 25(a)(ii): Assess using the block average slope, say 75% under 25 degrees and 25% leeway.</p> <p>Previously cultivated land should be able to be reworked or direct drilled without consent but with a management plan.</p> <p>Change to cultivation allowed three times in seven years.</p>
39.4	BAIRD N J & S A	Rule 25	Oppose	Delete.
40.9	BAKER David	Rule 25	Oppose Amend	Make the maximum vegetative strip width of 10m. Change to 25 degrees as the average of the padlock.
42.5	BAKER Rory	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
43.6	BAKER Shane & SHAW Wendy	Rule 25		<p>Rule 25(a)(2)(3): With good education and forward planning there should be no need to enforce extreme buffer distances.</p> <p>Rule 25(b)(ii): Cultivation doesn't take place more than once in a five year period. The cost of cultivation and regrassing is expensive, 2<sup>nd</sup> cropping makes financial sense.</p>
47.14	Balfour, Wendonside & Waikaia Group	Rule 25	Oppose in part	<p>ES to provide more clarity regarding this rule.</p> <p>Rule 25(a)(i) (1) – (3): Change to "<u>from the top of outer bank.</u>"</p> <p>To read as follows: "cultivation does not take place more than <del>once</del> <u>twice</u> in any five-year period."</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.38	Ballance Agri-Nutrients	Rule 25	Oppose in part	Clarify how this rule will work in practice. Amend to be more specific about the effects that it is intending to address, so that farmers are then able to address the same through Good Management Practices. Amend to manage cultivation on sloping ground at a farm level. See original submission for detail.
53.2	BAVIN Jono	Rule 25	Oppose	Delete Rule 25(a)(i).
54.11	Bayswater Dairy Ltd	Rule 25	Oppose	If you are not within 100m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment.  Clarify what is allowed if there is a small area present that is much steeper than the average slope.
56.6	BEATTIE Michael & Lynley	Rule 25	Oppose	Amend to a buffer of 3 metre minimum and 1 metre per degree of slope above 4 degrees. A slope of 20 degree or more is permitted provided the buffer requirements are met.
57.3	Beaumont Station (Glen Minty)	Rule 25	Oppose	Cultivation does not occur above 700 metres and on land with a slope greater than 35 degrees (this to include an explanation on what the slope of 35 degrees actually means on the ground).  Clarify what 20 degrees is. [See original submission for detail.]
58.3	Beaumont Station (Lynn Minty)	Rule 25	Oppose	Cultivation does not occur above 700 metres and on land with a slope greater than 35 degrees (this to include an explanation on what the slope of 35 degrees actually means on the ground).  Clarify what 20 degrees is. [See original submission for detail.]
59.3	Beaumont Station (Struan Minty)	Rule 25	Oppose	Cultivation does not occur above 700 metres and on land with a slope greater than 35 degrees (this to include an explanation on what the slope of 35 degrees actually means on the ground).  Clarify what 20 degrees is. [See original submission for detail.]
60.2	BEE Carole	Rule 25	Oppose	Increase the allowable slope to 30 degrees in paddocks of mixed contour.
62.11	Beef + Lamb NZ	Rule 25	Oppose Amend	Clarify how to accurately measure slope to ensure compliance with the rules. And use a Farm Environment Plan, not resource consent to cultivate steeper slopes Amend to read: The use of land for cultivation is a permitted activity provided the following conditions are

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				met: (i) cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse and within a distance of: (1) 3 metres from the outer edge of the bed on land with a slope <u>up to 10 degrees</u> <del>of less than 4 degrees (flat)</del> ; and (2) 10 metres from the outer edge of the bed on land with a slope between <u>10 to 20</u> <del>4 and 16</del> degrees <del>(rolling)</del> ; and (3) <u>15 20</u> metres from the outer edge of the bed on land with a slope of <del>greater than 16</del> <u>between 20 and 30 degrees</u> <del>(strongly rolling)</del> ; and (ii) cultivation does not occur above 700 metres above mean sea level, <del>or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep)</del> <sup>5</sup> . (b)...
64.16	BELGARD Family Trust (GA & JM Rauber)	Rule 25	Amend	No specific decision requested.
65.2	Bellevue Dairies Ltd	Rule 25(a)(ii)	Oppose	Delete, clarify the science behind the 20 degrees limit.
66.3	Ben Callum Station Ltd	Rule 25(a)	Oppose	No specific decision requested.
67.4	Benmore Downs Ltd	Rule 25		Possible look on a case by case basis cultivation buffers.
68.1	BENNETT Raymond	Rule 25	Oppose	No specific decision requested.
71.2	Beulah Organics NZ (BONZ)	Rule 25		Restrictions on intensive grazing and cultivation on certain angles would be very hard to legislate on our hill country farm where total effective area is required for our current farming regime.
74.5	BLACK G L & R R	Rule 25	Oppose	We recommend that Environment Southland amend this rule so that if you are not within 200 metres of a waterway and there is flat vegetative land to act as a buffer you should be able to cultivate over 20° as there is minimal risk of runoff of sediment. Clarification is required on small areas present within a paddock which are much steeper than the average slope.
79.4	BLAIR Phillipa Mary	Rule 25	Oppose	Encourage a 3m buffer of grass and grazing down hill towards water ways.
80.19	BLAKELY Barney & Stephanie	Rule 25	Oppose	Change to: Farmers are allowed to cultivate three times in a 36 month period for the practicality of farming. Increase to 30 degrees.
81.22	BLAKELY Hamish & Hannah	Rule 25	Oppose	Oppose permitted activity limit of 20 degrees – change to 50 degrees.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
81.23	BLAKELY Hamish & Hannah	Rule 25	Oppose	Change to farmers are allowed to cultivate three times in a 36 month period.
82.6	BLOMFIELD M J & K G Trust	Rule 25	Oppose	Amend to a buffer of one metre per degree with a minimum of three metre buffer. Twenty-five degrees would be more suitable and would give better opportunity to contain weeds. Clarify “outer edge of bed” and remove spraying from cultivation rule.
83.6	BOKSER Greg	Rule 25	Oppose	Remove rule (a)(i) 2 &3. Amend rule (a)(i) 1. To remove any references to slope. Strongly oppose rule (a)(ii), remove from plan.
84.5	BOLE Will	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
86.5	BOWMAR Ross	Rule 25	Oppose	Completely remove the requirement for a resource consent for cultivating land greater than 20 degrees.
87.3	Braemore Farms Ltd	Rule 25	Amend	Amend to: Less than 4 degrees has 1.5m from outer edge. Between 4 and 20 degrees has 5m from outer edge. Greater than 20 degrees has 10 from outer edge. And Cultivation could be permitted on slopes greater than 20 degrees. The farmer is to take into account safety and good farm management practices and also not cultivate more than twice in 10 years.
88.5	BRAITHWAITE Nathan	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.32	BRENTLEIGH Family Trust	Rule 25	Oppose	Farmers need to be allowed to cultivate twice in a 12 month period for the practicality of farming. Increase to 27 degrees.
91.4	Bridesdale Farming	Rule 25	Oppose	Remove the need for consent.
92.10	Bristol Grove Dairies	Rule 25	Amend	Rule 25(a)(i): No cultivation with the exception of grass to grass for one metre per degree of slope and clarify if ES will collect rates on this land now that it has become unusable? Will they be paying for the upkeep, weed and pest control of this land? Will they compensate the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				drop in value from the purchase price paid for this land?  Rule 25(b)(ii): Normally 10% of the farm is regrassed per year, using two years of cropping to control weeds, increase soil pH and increase soil fertility. By cropping for two years, this reduces the cost of regrassing.
93.6	Broadacres Ltd	Rule 25(a)	Oppose	Remove (a)(i) 2 and 3 and amend (a)(vii) 1 to remove references to slope and delete (a)ii.
96.2	BROWNING Stuart	Rule 25	Neutral	A better definition is required. There needs to be greater clarity about the point of determining the edge of the bed. Artificial watercourses can have a bank of 60 degrees or more and be more than 1m deep. If a ditch is 1.5m deep with a 45 degree bank onto a flat paddock then is the setback 3m from the edge of the bank (4.5m from the edge of the bed) or only 1.5m from the edge (3m from the edge of the bed)?
98.1	BRYSON M J & L M	Rule 25	Oppose	No specific decision requested.
99.4	BUCKINGHAM Greta	Rule 25	Oppose	A far more sensible approach would be to encourage the use of a 3m grass buffer around flowing waterways, a 20m last bit strip around waterways and grazing down the hills towards the waterways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
100.4	BUCKINGHAM Janette	Rule 25	Oppose	Remove buffer zone from around waterways. Replace with farmer best practice system.
101.4	BUCKINGHAM Thomas	Rule 25	Oppose	A far more sensible approach would be to encourage the use of a 3 metre grass buffer around flowing waterways, a 20 metre last bite strip around waterways and grazing down the hills towards the waterways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
102.5	Burwood Station Ltd	Rule 25	Oppose	I would recommend a buffer of 1 metre per degree with a minimum of a 3 metre buffer and I believe 25 degrees would be easier to stay within a rule.
103.8	BYARS A R & L J Trust	Rule 25(a)(i)	Amend	Rule 25(a)(i): Three metres from bed edge irrespective of slope.  Rule 25(a)(ii): Work to old plough lines if you must add more paperwork.
105.2	BYARS Jeremy	Rule 25	Oppose	To be able to use minimum tillage methods of cultivation (e.g. spray and pray or direct drilling) on land up to 27 degrees, not near waterways and could comply with increased setbacks. Want mechanical cultivation to exclude minimum tillage methods e.g. direct drilling. No cultivation on slopes above 27 degrees. Cultivation of 20 to 27 degrees requires

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				increased setbacks. Slope in Rule 25 (a)(11) average slope over any 50 metre distance.
107.5	BYARS Richard	Rule 25	Oppose	Thirty degrees far more workable than 20 degrees or stick to existing plough lines. Three metre buffer on all slopes next to waterway.
108.83	BYTHELL Jesse	Rule 25	Support	Retain.
109.3	C F L Farms Ltd	Rule 25	Amend	Include clauses dedicated to breaking in new land, because there isn't a lot of clarity around this issue.
112.2	CADE Andrew	Rule 25	Oppose	Cultivation should be allowed on proposed non-complying areas if mitigating activities take place prior to waterbody leaving the property i.e. settlement ponds etc.
113.2	CADE Errol	Rule 25	Oppose	Cultivation should be allowed on proposed non complying areas if mitigating activities take place prior to water body leaving the property i.e. settlement ponds etc.
114.4	CALLAHAN Pamela	Rule 25	Oppose	All gardeners will tell you that the ground needs cultivated to provide a good bed for plants to grow and we need to do the same to revitalise our paddocks.
115.1	CALVERT Paul	Rule 25	Oppose	Twenty five degrees is more appropriate than 20 degrees with allowances for small areas over the limit.
116.4	CAMPBELL Jenny	Rule 25	Support	Retain.
117.2	Campbells Block Ltd	Rule 25	Oppose	Provide clarity surrounding the 20 degree rule and what it applies to in a block of land to be worked i.e. does it apply to the whole block if part of it is greater than 20 degrees or does it only apply to the area of land within the block greater than 20 degrees. I think the degree limit needs to be lifted to 30 degrees.
118.8	Carmyllie Farm	Rule 25	Oppose	Cultivation has to be looked at as 20% is a normal hill on most farms so I think 25% would be more achievable. Cultivation at certain times of year as well e.g. how can we avoid weather and rain fall? So on steeper slopes that has to be taken into account over the paddock size. If a paddock has a slope over 25% in it but there is 30m of flat land or run off, is that achievable? Setback could be set by the degrees of paddock e.g. 16% - 3m and over 16% - 10m.
119.3	Carnie Farms	Rule 25	Support Oppose	Retain rule (b)(i) and (iii) and delete 20 metre – 4-16 degree rule and leave rule at three metres which everyone will comply with and which will be more practical.
120.4	CARTER D G & B J	Rule 25(a)(ii)	Oppose Amend	Allow cultivation up to 25 degrees, retain no cultivation over 700 metres.
121.2	CARTER W J	Rule 25	Oppose	I believe 25 degrees would be easier to stay within a rule.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
122.1	CATHCART Paul	Rule 25	Oppose	Delete 20 degree cultivation limit.
124.3	CHAMBERLAIN Terry	Rule 25(a)(ii)	Oppose	(a)(ii) The degree should be increased to allow for more land for winter grazing.
125.2	CHARTRES Peter	Rule 25(a)	Amend	Amend wording to Rule 25(a) as follows: “the use of land for cultivation is a permitted activity provided the following conditions are met <u>as far as practicable.</u> ”
127.1	CHISMAN Trust	Rule 25(a)(ii)	Oppose	Remove Rule 25(a)(ii) 20 degree slope component.
130.3	CHRISTIE Raymond John	Rule 25	Amend	Cultivate up to 28 degrees on average for each block.
131.2	CHRISTIE William	Rule 25	Amend	When measuring slope angle it should be determined by taking an average over a block to be more consistent.
133.5	Civil Tech Ltd	Rule 25	Amend	Rule 25(a) and (b): Alter the wording. Why not just measure the top edge of the waterway bank where the fence is or would be? As it is worded would mean that waterways with high banks may push the cultivation to 20m when there is 3m of flat land that would meet the acceptable standard.
135.5	CLARKE A W & T M Partnership	Rule 25	Amend	There should be a larger range of guidelines for sloping ground, with the responsibility put back on the farmer, with the understanding that any failure, due to not following guidelines, is a breach of the rule.
136.3	CLARKE Alanna	Rule 25	Oppose	Delete Rule 25 and replace with enforcement of good management practices, as shown in the Otago Southland wintering trial.
139.6	CLARKE David	Rule 25	Oppose	Delete Rule 25 and instead enforce good management practices as was implemented in the Otago Southland wintering trial.  Enforce best management practices for the grazing of winter crops as used in the Otago Southland wintering trial, and encourage direct drilling or aerial sowing of crops into non tilled ground on step areas as this also reduces sediment loss compared to standard cultivation.
140.3	CLARKE Julie	Rule 25	Oppose	Delete.
141.4	CLARKE Julie Ann & TUCK Roger	Rule 25	Oppose	Delete.
145.3	CLELAND J A & D M & S J Partnership	Rule 25	Oppose	Change to 25 degrees.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
146.2	Clemcorp Ltd	Rule 25	Oppose	20 degree limit on cultivation – 25 degrees more appropriate cut off with allowance for small areas within a paddock e.g. if less than 10% or 20% is sloped over the limit, allow cultivation anyway.
147.7	CLEMENT Karina	Rule 25(a)(i)	Amend	(a)(i) 1 - definition of outer edge, make clearer as river changes during the season. Angles vary through paddock, it is not a constant angle ... Where do you measure from? All should be addressed in Management Plan so is this required at all?
148.4	CLEMENT Paul & Linda	Rule 25	Oppose	We suggest that the consenting process for cultivation be removed.
150.5	CLIFFORD Mervyn & Judy-Ann	Rule 25	Support Oppose	Buffer zone to three metres up to 16 degrees, 10 metres over 16 degrees. Allow cultivation up to 30 degrees.  ES provide maps for sloping ground so if we get the maps wrong we will not be fined. Farmers should use the plan as a guide for good farm management practice.
152.15	Clover Bell Ltd	Rule 25	Support in part	Remove the one year in five limitation.
153.3	Coalbrook Partnership	Rule 25	Oppose	Any land that has previously been cultivated should be allowed to continue provided that setback rules are abided by next to waterways. Any new land development needs to be consented. The slope should be up to 25 degrees.  Allow cultivation on slopes greater than 20 degrees where only a % of the paddock is greater than 20 degrees and away from any setbacks for waterways.
155.6	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 25(a)(i)(1)	Support in part Amend	To maintain Rule 25(a)(i)(1) as notified and consider submissions from other farmers with regard to cultivation of steeper ground.
156.9	COCKBURN Grant & Rachel	Rule 25	Support	Retain.
158.6	Colin Woodrow Ltd	Rule 25(a)(i)(3)	Oppose	Delete.
160.8	COLLING Megan	Rule 25	Oppose	Not being able to crop on greater than 20 deg, 20m for 16 deg slopes. Remove restrictions on cultivation within 5 years.
163.4	CONLAN Eddie & Judy Family Trust	Rule 25(a)(ii)&25(c)	Amend	There needs to be a provision to allow paddocks with small areas of 20 degrees to be cultivated provided they have a stand back as per Rule 25(a)(i).
164.3	Conlan Farming	Rule 25	Oppose	Remove limit on cultivation over 20%. Remove setbacks from waterways for cultivation on winter grazing.



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167.2	COPLAND M C & S	Rule 25	Oppose	We oppose the need to pay for, and apply for a consent plan to cultivate. Retain current rules set in place now.
168.3	COPLAND R D & N J Family Trust	Rule 25(a)(ii)	Oppose	I recommend that land that has been cultivated up to 40 degrees slope can continue to be cultivated without a consent. Any land greater than 20 degree slope would require a 50 metre setback from any waterway.
169.2	Copper Valley Holdings Ltd	Rule 25(a)(ii)	Oppose	Amend to a 30 degree slope with workable area restricted to 8% of farm/per annum.
172.17	COWAN Les & Christine	Rule 25	Oppose	Remove and replace with a rule allowing farmers to make their own decisions.
173.4	COWIE Martin	Rule 25	Oppose	A far more sensible approach would be to encourage the use of a 3m grass buffer around flowing waterways, a 20m last bite strip around waterways and grazing down the hills towards the water ways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
175.5	CRACK Stephen	Rule 25	Oppose	Delete.
177.4	Cromel Valley Station Ltd	Rule 25	Amend	Needs to be looked at on a case by case basis, using good practice management. More Dave Connors with farm based experience making decisions.
179.7	CROOKS Jonathan Ross & Sarah Jane	Rule 25(a)(i)		We suggest that the setback distance be a maximum of 10 metres for any slope OR implement good management practices rather than regulated setback distances.  Amend to remove restriction on cultivation on slopes over 20 degrees where there are no present waterways, rivers, lakes, natural wetland, modified or artificial watercourse within the paddock.  Delete Rule 25(b)(ii).
183.5	CUTHBERTSON John	Rule 25	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.5	CUTHBERTSON Shane	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points

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185.3	D J & D A Anderson Ltd	Rule 25(a)(i)	Support	Retain (a)(i).  Amend (b)(ii) to allow cropping twice in a paddock within one year, and not to re-cultivate that paddock thereafter again for five years.
189.36	Dairy Holdings Ltd	Rule 25		Amend Rule 25(a)(i) and 25(b)(i) to include a new footnote: <u>* In limited instances the location of existing fencing and the location of the waterbody may require limited cultivation closer than the setbacks set out (this is permitted provided that the average set back remains the distance stated).</u> And delete Rule 25(a)(ii).
190.14	DairyNZ	Rule 25	Oppose	Delete Rule 25(a) and replace with: <u>(a) The use of land for cultivation is a permitted activity provided the following conditions are met:</u> <u>(i) cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse and;</u> <u>(ii) a minimum buffer of 3 metres from the outer edge of the bed on land with a slope of less than 16 degrees (flat to rolling) and a minimum buffer of 5 metres on slopes greater than 16 degrees is maintained and;</u> <u>(iii) all critical source areas require the maintenance of a temporary (unless permanent for the purposes of Rule 23) sediment retention system until pasture has re-established and is suitable for grazing and,</u> <u>(iv) cultivation does not occur above 700 metres above mean sea level, or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep) and,</u> <u>(v) critical source areas cannot be sown with feed for intensive winter grazing unless there is a temporary (unless permanent for the purposes of Rule 23) sediment retention system in place until pasture has been established and suitable for grazing following the grazing of previous feed for intensive winter grazing.</u>
191.11	DALE J M & K B		Support in part	Retain Rule 25(a).  Rule 25(c): ES should work with farmers to determine 'best practice' rather than implementing costly monitoring processes.  Rule 25(ii): Limitations around cultivation should be excluded from this plan until farmers

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				have been allowed to input. Environment Southland must consider the financial, economic and social repercussions to Southland.
192.10	DALE P T & S B Trust	Rule 25	Oppose	Provide clarification of where the outer edge of the bed is. Re-visit the gradient percentages and work with industry leaders Dairy NZ & Fed Farmers to establish consensus.
194.5	Davie Justin	Rule 25	Oppose	Minimum 5 year turnaround is not practical. Provided best practice is followed regarding slope, water bodies and drainage then a shorter period is acceptable.
195.5	DAVIE Stuart	Rule 25		The existing setback of 3 meters needs to apply. Twenty five degrees is a good practical restriction and land already cultivated should continue to be able to be worked up.
196.4	DE BOER Frido	Rule 25		Delete.
198.4	DIACK Hugh	Rule 25	Amend	Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope. Delete the following from Rule 25 (a) (ii): “cultivation does not occur above 700 metres above mean sea level. <del>Or mechanical cultivation on land with a slope greater than 20 degrees moderately steep</del> ”. Delete Rule 25 (b) (ii) and (iii).
199.2	DICKIE Alan & Valerie	Rule 25	Oppose	Delete requirements for cultivation plan.
200.6	DICKIE Alton Brent	Rule 25	Oppose	Remove rule (a) (i) 2&3. Amend rule (a) (i) 1 to remove any references to slope. Delete (a) (ii).
202.2	DICKSON Brent Gordon	Rule 25 (b) (ii)	Amend	That the 20° slope consenting point be changed to 30°. That there be a transition period for ground currently under cultivation that exceeds the slope requirements. That any required consent can cover several years over all the areas on the farm that are required to be used for the growing of crops, rather than a consent each year.
203.2	DICKSON Bruce John	Rule 25(a)(ii)	Amend	<ol style="list-style-type: none"> <li>1. That the 20° slope be changed to 30°.</li> <li>2. Rather than require consent, the areas should first be subject to inspection and sign off by a land sustainability officer who can decide if it needs a consent or not. If not, they can sign it off.</li> <li>3. That there be a transition period for ground already under cultivation that exceeds the slope requirements.</li> </ol>
204.6	DICKSON Grant	Rule 25	Oppose	Remove rule (a) (i) 2 & 3 amend rule a (i) 1 to remove any references to slope.  Delete Rule 25(a)(ii).
205.28	Dillon Ag Ltd (Chris Dillon)	Rule 25	Oppose	Farmers need to be allowed to cultivate twice in a 12 month period for the practicality of farming.

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				Increase to 27 degrees.
206.28	Dillon Ag Ltd (Rochelle Dillon)	Rule 25	Oppose	Farmers need to be allowed to cultivate twice in a 12 month period for the practicality of farming. Increase to 27 degrees.
208.2	DILLON M J & S E	Rule 25(a)(i)	Oppose	Increase 20 degrees (moderately steep) to 25 degrees.
209.33	DIPROSE Dave	Rule 25	Oppose	Remove the Rule 24 as it is confusing in the field to understand, better to educate and have a cultivation plan in Appendix N. This could be covered better in a wintering plan including a cultivation plan.
210.86	Director-General of Conservation	Rule 25	Support in part	Retain Rule 25 with the following amendments; A new condition in (a) and (b): <u>Is not on a marginal strips, an esplanade reserve or strip, or unformed road where they are adjacent to a river or lake bed</u> A new matter for discretion in (c): 4. the purposes for which the land is held . (d) Despite any other rule, the use of land for cultivation in the Alpine physiographic zone, is a <del>non-complying prohibited</del> activity.
211.4	DITCHFIELD Dylan	Rule 25	Oppose	Apart from having no cultivation above 700m, I would recommend all other measures be excluded from the rule and the issue on cultivation on sloping land be mitigated through a management plan covered in appendix N that will be more specific to the operation and issues at hand.
212.3	DODD N R & J L	Rule 25	Support Oppose	Leave it at 3 metres from outer edge of waterway, delete degrees from proposal.
214.15	Donald Farm	Rule 25	Oppose	Rule 25(a)(i): <u>Recommend</u> the proposed distances be guidelines. Consideration given in the management plan to things such as type of crop, stock class, way paddock is grazed, cultivated or direct drilled, riparian strip present or not.  Rule 25(a)(ii): <u>Recommend</u> that the Farm Management Plan be the vehicle for determining what can be cultivated as this rule is not practical and very difficult to enforce.  Rule 25(c): <u>Recommend</u> it be a controlled activity.
215.4	Dooley Partnership	Rule 25	Amend	Exclude sheep completely from 20 degree angle rule, as cattle/deer are far more damaging.

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				Alternately set steeper angle for sheep, i.e.35 degrees. 20 degrees for sheep is completely unreasonable and will simply result in speeding up our rotation, leading to further soil degradation, week burden and costing production.
219.6	DRUMMOND R G & J M	Rule 25	Oppose	Align with a LEP which plan for land being cultivated/D\direct drilled or spray prayed over 16 degrees with various options to reduce runoff e.g. silt catching ponds, rock/scrub windrows say 5m before Gully.
220.15	Drylands Farming Ltd	Rule 25	Support Amend	Amend Rule 25(a)(ii) to say 'cultivation does occur Above 700 metres and on land with a slope greater than 25 degrees.
221.15	DRYSDALE Family Trust	Rule 25(a)	Support Amend	Amend Rule 25(a)(ii) to say 'cultivation does occur Above 700 metres and on land with a slope greater than 25 degrees. Amend rule 25(b)(ii) to say 'cultivation does not take place more than twice in a 10 year period', as this allows normal grass renewal policy on farms.
222.3	DUFF Bradon	Rule 25(a)	Amend	Amend to 30 degrees based on previous cultivation, previous amended setback rules apply.
223.2	DUFF Farms	Rule 25		Remove restriction of 20 metres when cultivating above 16 degrees.
224.10	DUFFY Paul	Rule 25		Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils. The consent process needs to be straight forward, simple, not expensive for farmers and well explained.  Rule 25(a)(ii): Clarify whether this will apply to land that is 50 metres or more from a waterway but has a tile drain at the base? Is the average of 20 metres, in relation to the 20 degree slope, vertical or horizontal 20 metres or both?
225.5	DUGDALE Peter	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
227.3	DUNBAR M	Rule 25	Oppose	No specific decision requested.
230.1	DYER Cyril	Rule 25		Remove from Rule 25 (a)(ii) the words – or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep)
233.10	DYSON Valerie &Glyn	Rule 25	Amend	Cultivation should be allowed in a paddock where more than 50% of the paddock has a slope of 25 degrees or less. Where more than 50% of the paddock has a slope of greater than 25 degrees, cultivation of lesser slopes is still permitted. Re-word 5 to be...over any 20 mere

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				distance vertically.
234.1	EADE Bruce	Rule 25	Oppose	The maximum slope should be increased from 20 degrees to 30 degrees with a 20m setback if 25% of paddock is greater than 30 degrees.  Amend to: Less than 8 degrees – 3 metres. 9-20 degrees – 10 metres. 21-30 degrees – 20 metres.
237.3	Eaton Willow Lodge (Brent Eaton)	Rule 25	Oppose	We request that the consenting requirement is removed, on the basis that it is a costly exercise which would otherwise be managed through a compulsory Management Plan. Sloping Ground-The rule references that the slope is measured from the outer edge of the bed, when considering in most cases the bank of a waterway will have a greater slope than the surrounding land. Therefore, the rule should read ‘from the outer bank’ which would be a more accurate measure of the slope on the paddocks next to the waterway
238.3	Eaton Willow Lodge (Derek Eaton)	Rule 25	Oppose	We request that the consenting requirement is removed, on the basis that it is a costly exercise which would otherwise be managed through a compulsory Management Plan. Sloping Ground-The rule references that the slope is measured from the outer edge of the bed, when considering in most cases the bank of a waterway will have a greater slope than the surrounding land. Therefore, the rule should read ‘from the outer bank’ which would be a more accurate measure of the slope on the paddocks next to the waterway
239.3	Eaton Willow Lodge (Paul & Elaine Eaton)	Rule 25	Oppose	We request that the consenting requirement is removed, on the basis that it is a costly exercise which would otherwise be managed through a compulsory Management Plan. Sloping Ground - the rule references that the slope is measured from the outer edge of the bed, when considering in most cases the bank of a waterway will have a greater slope than the surrounding land. Therefore, the rule should read ‘from the outer bank’ which would be a more accurate measure of the slope on the paddocks next to the waterway
240.3	EDIE Partnership	Rule 25	Amend	Should be able to cultivate slopes greater than 20 degrees if there is no watercourse below.  Each farm should be independently assessed on cultivating.
243.5	ELS Luren	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
245.4	Enfield Ltd	Rule 25(a)(ii)	Oppose	Amend the permitted activity up to 27 degrees of slope.

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248.2	Erne Hill Ltd	Rule 25	Oppose	The steepest slope should be altered to a maximum of 35 degrees with no more than 25% of the area over 20 degrees. The setback should be measured on a graduated distance scale rather than all based on 20 metres. There still must be a more refined way to achieve the principle.  Amend Rule 25(b)(iii) to include one crop rotation every five years.
249.26	Ernslaw One Ltd	Rule 25	Support Amend	Retain Rule 25 subject to clarification of definitions of cultivation.
253.5	EVANS Frederick & BROCKMAN Carla	Rule 25	Oppose	Examine and manage cultivation buffers as needed for each farm to produce the desired water quality results. Again this “one size fits all” approach does not intelligently produce the desired water quality results.
255.2	EVANS Mark	Rule 25	Oppose	Base the rule on a percentage instead of an area. Amend the (a)(i)(2) and (3) from 10 metres and 20 metres to 5 metres and 10 metres. Amend the 20 degree trigger to be an average over the paddock to perhaps more than 60% of the paddock over 20 degrees. I oppose rule (a)(i)(3). I also oppose the need for a consent to cultivate over the 20 degree mark, not so much of our land is over that but a lot of the paddocks have steep pinches in them which are more often than not left out but would trigger the rule, just another cost to the farmer.
257.4	EVANS O R & T D	Rule 25	Amend	Take stock off crop when conditions are wet. Make sure good crossings and troughs are provided for. More sediment traps. No working off block if say 80% of block is over 20 degrees. Cultivation 5 metres from 4 degrees to 16 degrees. Cultivation 5 metres from 4 degrees to 16 degrees. Cultivation 10 metres from >16 degrees. Stock still able to graze buffer zone, just no cultivation. Sower trucks able to safely cover the area.
259.11	F D Enterprises Ltd	Rule 25	Oppose	I propose there needs to be clear definition from Environment Southland in relation to the cultivation gradients within paddock variability. I propose that the need for a cultivation consent is removed. Wording change to “ <u>from the top of outer bank</u> ” for 25(a)(i) (1) – (3).
260.2	Fairlight Station Ltd	Rule 25	Amend	Amend to instead use Management Plans to encourage good management practices and put pressure on bad practices.
261.5	Fairmount Perendale Stud Farm	Rule 25	Oppose Amend	A more workable and practical solution is necessary in order for farmers to survive, with particular reference to hill country farming.

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262.5	Fairview Eastern Bush Ltd	Rule 25	Oppose	Amend consents to be done every 5-10 years free of charge or make a higher degree slope threshold.
213.1	DODDS Geoffrey	Rule 25	Oppose	A better option than the 20 degree slope limit would be to use a common sense approach to where a wheel tractor can safely work to within buffer zones in place.
264.8	FarmRight Ltd	Rule 25	Oppose	Remove consent requirement for cultivation. Clarify as to where in the paddock the slope is measured and how it is measured in regard to changing contour.
265.88	Federated Farmers of NZ (Southland Province)	Rule 25	Support in part	<p>Amend as follows:</p> <p>(a) The use of land for cultivation is a permitted activity provided the following conditions are met:</p> <p>(i) cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse and within a distance of:</p> <p>(1) 3 metres from the outer edge of the bed on land with a slope of less than 48 degrees (<del>flat</del>); and</p> <p>(2) <del>10 metres from the outer edge of the bed on land with a slope between 4 and 16 degrees (rolling)</del> on slopes above 8 degrees set-backs will be worked out as follows (slope minus 5m), i.e. if the slope is 15 degrees, the set-back will be 10m; <del>and</del></p> <p>(3) <del>20 metres from the outer edge of the bed on land with a slope of greater than 16 degrees (strongly rolling); and</del></p> <p>(ii) cultivation does not occur above 7800 metres above mean sea level,</p> <p>(iii) <del>mechanical</del> cultivation <u>does not occur</u> on land with a slope greater than 250 degrees (<del>moderately steep</del>); (where at least half of the area to be cultivated is under 25 degrees)</p> <p>(b) The use of land for cultivation, that does not meet the setback distances of Rule 25(a)(i), is a permitted activity provided the following conditions are met:</p> <p>(i) cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse and a distance of 31 metres from the outer edge of the bed; and</p> <p>(ii) cultivation does not take place more than once in any five year period; and</p> <p>(iii) cultivation is for the purpose of renewing or establishing pasture; and</p> <p>(iv) cultivation does not occur above 7800 metres above mean sea level.</p> <p>(c) The use of land for cultivation, which does not meet one or more of the conditions of Rule 25(a) or Rule 25(b) is a restricted discretionary activity.</p> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>1. the management of sediment and other contaminants from critical source areas;</p> <p>2. risks to biodiversity and water quality and mitigation measures for addressing those risks; and</p> <p>3. monitoring, inspection and audit requirements.</p> <p>(d) Despite any other rule, the use of land for cultivation <del>in the Alpine physiographic zone above 800m</del>, is a non-complying activity.</p>
266.6	Fenham Downs Ltd	Rule 25	Oppose	Environment Southland to lift the threshold to 35 degrees or more.
267.1	FERGUSON Raymond	Rule 25	Oppose	Three metre buffer should be up to 20 degrees slope and a plough furrow left to trap runoff.
268.3	Fermoy Holsteins Ltd	Rule 25	Amend	Amend: less 10 degrees – 2 metres, 10 – 16 degrees – 6 metres and 16 degrees and over – 10 metres.
275.3	FLETT Alan	Rule 25	Oppose Amend	<p>Should be able to spread when conditions allow.</p> <p>Distances should be 3m up to 10 degrees, 10m up to 25 degrees and 15m over that, going by experience and no more than 5m around duck ponds and should be done as best practice not legislated.</p>
277.48	Fonterra Co-operative Group Ltd	Rule 25	Oppose in part	Amend Rule 25(a)(i) to require a 3 metre setback on slopes of less than 4 degrees, and above 4 degrees a 1 metre setback for every degree of slope up to 16 degrees.
279.71	Forest & Bird NZ	Rule 25		<p>Amend Rule 25 as follows:</p> <p>“(a) The use of land for cultivation is a permitted activity provided the following conditions are met:</p> <p>(i) Cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse within a distance of:</p> <p>(1) <del>3</del> 5 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope of less than 4 degrees <u>(flat) or 10m measured horizontally from the outer bed of a natural wetland or watercourse with trout and / or Inanga spawning habitat on land with a slope of less than 4 degrees (flat)</u>; and</p> <p>(2) 10 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope between 4 and 16 degrees and</p> <p>(3) 20 metres <u>measured horizontally</u> from the outer edge of the bed on land with a slope greater than 16 degrees and</p> <p>(ii) Cultivation does not occur above 700m above mean sea level.</p> <p>(b) The use of land for cultivation is a permitted activity provided the following conditions</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>are met:</p> <p>(i) Cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse or artificial watercourse <del>and</del> <u>within</u> a distance of 3 5 metres <u>measured horizontally</u> from the outer edge of the bed;</p> <p>.....</p> <p>(iv) Cultivation does not occur above 700 metres above mean sea level.</p> <p>(c) [Retain]  <u>Cultivation in the Alpine Zone is prohibited.</u>  <b><i>Environment Southland will restrict the exercise of its discretion to the following matters:</i></b></p> <ol style="list-style-type: none"> <li>1. The management of sediment and other contaminants from critical source areas</li> <li>2. risks to biodiversity and water quality and <u>measures to avoid, remedy or mitigate those risks and</u></li> </ol> <p>Add new 3. <u>Risks to areas of significant indigenous vegetation and habitats and measures to avoid those risks</u></p> <p>Add new 4. <u>Risks to the preservation of the natural character of wetlands, lakes, rivers and their margins, and</u></p> <p><del>3-5</del> <u>Monitoring, inspection and audit requirements.</u></p> <p>...</p> <p>(d) Despite any other rule, the use of land for cultivation in the Alpine physiographic zone <i>or Coastal Marine Area</i>, is a <del>non-complying</del> activity.</p>
281.2	Four Legged Farming Ltd	Rule 25	Amend	<p>Amend so:</p> <ol style="list-style-type: none"> <li>1. That the 20 degree slope probation be changed to 30 degrees or</li> <li>2. That the 20 degrees be back a set distance from a waterway with buffer zones at set out in 25(a)(i)1-3</li> <li>3. Rather than require consent, where the areas is 20 degrees or greater are only a small proportion of the area to be cultivated the area be subject to inspection and sign off by a land sustainability officer.</li> </ol>
282.2	Foveaux Investments (2008) Ltd	Rule 25	Oppose	Twenty-degree restriction increased to 45 degrees before cultivation does not occur.

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286.4	Frew Farming Ltd	Rule 25	Support Amend	Amend to: <ul style="list-style-type: none"> <li>1. 3m from outer edge at 10 degrees.</li> <li>2. 10m from outer edge between 10-20 degrees.</li> <li>3. Sloped above 20 degrees should be done with a farm management plan, leading into consent where necessary.</li> </ul>
287.4	FREW Mervyn	Rule 25	Oppose	We recommend cultivation from riverbed should be set at 3 metres less than 10 deg slope. 10 metres from 10-20 deg slope. 15m from 20-30 deg slope.
290.3	G A Young & Co Ltd	Rule 25	Amend	Make the ruling three metres in setback from a waterway up to five degrees, then on a graduated scale up to 25 degrees with a maximum 20 metre setback.
291.5	G J Gardner	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
292.16	G S & M A Clearwater Ltd	Rule 25(a)(i)(2) (3)	Support	Rule 25(a)(i)(2) (3) - Please refer to Telford Directional Grazing Trials, which prove significant sediment and nutrient run off being reduced through 3m buffer zones and directional grazing towards CSA or waterways.  Rule 25(a)(ii) - I would like to see the consent process removed for cultivation on slopes 20 degrees or more as with the use of Good management Practice (GMP) outlined in the FMP will achieve ES objectives.  Retain Rule 25(b)(i)(1).
294.4	Gardyne Agriculture Ltd (Duncan Gardyne)	Rule 25	Amend	Alternative measurements <ul style="list-style-type: none"> <li>- Lift to 25 – 30 degrees.</li> <li>- If there's no immediate waterway and small % of paddock with gradient greater this rule could be overlooked.</li> </ul>
295.4	Gardyne Agriculture Ltd (Fred Gardyne)	Rule 25(a)	Amend	Alternative measurements: Lift to 26-30 degrees. If there is no immediate waterway and small percentage of paddock with gradient greater, this rule could be overlooked.
296.7	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 25	Amend	Rule 25(a)(i)(2)&(3) three metres from the outer edge of the bed.  Rule 25(a)(ii) 25 degrees slope must be over 50% of the paddock.

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297.11	GARDYNE Hugh & Kathie	Rule 25(a)		25(a)(1) - change to 5 degree slope. 25(a)(2) - change to slope range 5 – 30 degrees. 25(a)(3) - change to slope greater than 30 degrees.
298.6	GARDYNE Joanne	Rule 25	Oppose	All cultivation to have a standard three meter setback and limit of 800 meters above sea level throughout the whole plan. Change slope for cultivating to 25 degrees and that it is a permitted activity if 50% of the paddock is at a slope of 25 degrees or less.
299.17	GARDYNE John	Rule 25	Oppose	Standard setback of 3m to 16 degrees after that, degrees less 5. Restricted discretionary consent for 25 degrees or greater on more than 50% of the paddock. Have standard 800m above sea level.
300.17	GARDYNE Jonathan	Rule 25	Oppose	Again, consistency is needed with rules, 3m setback, 800m altitude as this fits with the alpine zoning. Grass to grass needs turned over more than once every 10 years. 20 degrees is not enough, would need at least 25-30.
301.3	GARDYNE Lois	Rule 25	Oppose	Rule 25(a)(i)(1-3): Use of land for cultivation is permitted on any slope of 25 degrees or less or in any paddock where 50% of the paddock is at a slope of 25 degrees or less.  Rule 25(a)(ii): Cultivation does not occur 800m above sea level.
304.3	Gavenwood Farm	Rule 25(a)(ii)	Amend	Amend so that if over a certain percentage (say 50%) of an area exceeds the 20 degrees then a consent is needed for mechanical cultivation.
305.2	GERRARD L J & J A	Rule 25	Amend	All stock fencing around a waterway (except for deer and sheep) should be a minimum of two wires permanent fencing.  Amend Rules 25 to read “within a distance of 3/10/20 metres from the annual fullest flow or level.  For Environment Southland to make it clear how or who will determine the fullest flow or level.  Amend to read that when pasture is being renewed or established that cultivation if practicable could be a permitted activity right to the outer edge of the bed.
309.1	GILL Aaron	Rule 25	Oppose	Delete limit on cultivation on slopes greater than 20 degrees.

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310.3	GILL Greg & Liz	Rule 25	Oppose	There needs to be a bit more clarification on mechanical cultivation on slopes of more than 20 degrees. Maybe the setback could be a minimum of 3 metres but use a ½ metre per degree instead of the proposed distances which seem extreme. Delete rule stating no cultivation on slopes above 20 degrees.
311.2	GILL Murray	Rule 25	Amend	Do not restrict cultivation on steep land if it is not near waterways.
312.5	GILLESPIE David	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural viewpoints
313.7	GILLESPIE Maria	Rule 25	Amend	That margins can be lesser for winter grazing cultivation and regressing cultivation where other practical mitigation measures have been put in place. Refer to comments on rule 23.
314.5	Gladvale Farms Ltd	Rule 25	Oppose Amend	Rule 25(b)(ii)(iii): Needs to be 4yrs and then 4yrs grass.  Rule 25(i) 1,2&3: Should only be 3 metres and then grazed end of August.
316.4	Glenaffric Partnership	Rule 25	Oppose	We would like to see no restriction, however allow and trust farmers to have good practice when grazing.
317.2	Glenaray Station (W Pinckney Ltd)	Rule 25(a)(ii)	Amend	Rule 25(a)(ii) to be modified to allow land currently in crop to be sown to a second crop or sown to grass. Cultivation slope limit to be increased to 30%. Monitoring of water quality to be a criteria for allowing cultivation on a slope of up to 30%.
319.15	Glendhu Dairies Ltd	Rule 25	Oppose	Change degree limit and change this rule to 2 times in a 5 year period.
321.1	Glengordon Farm Ltd	Rule 25	Oppose	We would like to see the rule to be based on a percentage of farm size i.e. 15%. We would also like to see the degree of slope permitted to be cultivated lifted from 20 degrees to 25 degrees to allow more flexibility in certain situations.
322.10	Glenlapa Station	Rule 25(a)	Oppose	Remove cultivation from the plan. Amend (a)(i) as follows: 3m up to 16 degrees 10m up to 30 degrees 20m more than 30 degrees. Amend (a)(ii) to allow mechanical cultivation up to 40 degrees. Amend (b) to accept that appropriate cultivation will be undertaken and effects mitigated in

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				accordance with our FMP.
323.3	Glenshe Trust	Rule 25	Amend/Oppose	Change setbacks to 3m on slopes up to 16° and 10m on slopes over 16°. State who is ultimately liable for cultivation over 20°, contractor or farmer? Remove 20° limit on cultivation or if there is a limit make it 35° and allow 20% of a paddock over limit. Forestry must be removed from 20° limit.
324.2	Glentui Farms Ltd	Rule 25	Oppose	Delete restrictions and include buffer zones as part of FMP and 'best practice' with Land Sustainability team involved.
326.2	GLYNN Chris & Dawn	Rule 25	Amend	We believe this needs to be looked into further and amended.
327.1	GOATLEY Russell	Rule 25		Regarding the proposal that land with a slope greater than 20 degrees not be cultivated I think that this land angle needs to be increased to 30 degrees.
332.3	GRANT Robert	Rule 25	Oppose	Amend this Rule to allow a percentage of the land that is over 20 degrees to be cultivated.
334.4	Greenvale Station Ltd	Rule 25	Amend	Amending this Rule to 30 degrees would be more applicable.
335.5	GREER Robin	Rule 25		Increase cultivation of sloping ground to greater than 20 degrees slope.
336.5	GRIMM Hamish	Rule 25	Support	Science and practice have to work together for achievable outcomes – see comments on Appendix N under management requirements.
337.15	Growplan Ltd	Rule 25		<p>Three width controls are better than one but this is still a very blunt instrument and one which I fear will have little real effect except removing valuable land from production. What is needed is the ability to choose between this approach and a site-specific solution. For instance lidar/surface scan to enable site-specific setback design tailored to soil, climate and crop/s. This process does exist as a number of methods; some fully manual, on-the-ground methods based on simple proven rules-of-thumb through to various levels of GIS approaches which are semi-automated.</p> <p>I am aware of a number of cases from pastoral cropping, field crops and forestry, where when a variable width buffer approach was applied, land taken up in buffer area was 30 to 50% less than with a fixed width approach. At the same time environmental mitigation is proven with these approaches.</p> <p>&lt;further comment&gt;</p>
339.11	GUNN Olivia	Rule 25	Oppose	If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment. There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.

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340.3	Gunton Farms Ltd (Mark Gunton)	Rule 25(b)(iv)	Amend	Amend Rule 25(b)(iv) to 800m.
341.10	Gunton Farms Ltd (Jeremy Gunton)	Rule 25(a)(ii)	Oppose	Cultivation does not occur above 800 meters above sea level. Cultivation does not occur on land with an <u>average</u> slope greater than 25° - 30°.
344.6	Hall Ag Ltd (Glenda Hall)	Rule 25	Amend	Amend the distances for cultivation on slopes.  Amend measurements to lift to 26-30 degrees and if there is no immediate waterway and small % of paddock with gradient greater this rule could be overlooked.
345.6	Hall Ag Ltd (John Hall)	Rule 25	Amend	Amend the distances for cultivation on slopes. Amend measurements to lift to 26-30 degrees and if there is no immediate waterway and small % of paddock with gradient greater this rule could be overlooked.
349.3	HAMILTON N J & R H & Manapouri Station	Rule 25(a)(2)	Oppose	Delete and leave landowners to make decisions on whether or not to cultivate.
353.2	Hardwick Farm	Rule 25(a)(ii)	Oppose	These areas should be looked at on a case by case basis in the farm implement plan to form an outcome that would suit the environment and farming.
357.1	HARVEY John & Clare	Rule 25(a)(ii)	Oppose	We think the 20 degree angle for worked ground should be much higher.
358.15	HASTIE Stephen	Rule 25	Oppose	Include far more input from a variety of farmers in any ES proposals, so that councillors can learn more and make better informed decisions regarding farming practices. Clarify where di the 20 degrees come from????
360.2	Hazeldean Downs Ltd	Rule 25	Oppose	A 27% gradient for the cultivation of the ground is a much more reasonable and sensible scenario.
361.12	HBG AgriLimited	Rule 25	Oppose	Include provision for cultivation above 20 degrees if you are not within 100m of a waterway and there is flat land to act as a buffer, as there is minimal risk of runoff of sediment.
362.7	Hedgehope Grazing Ltd	Rule 25(a)(i)	Oppose	“Three metre vegetated strip for all wintering” and all critical source areas are protected to minimise sediment loss.
365.6	HEENAN M D and D W	Rule 25	Amend	Delete requirement for a 20 metre setback, and instead have a 10 metre setback from the bed where there is a greater than 16 degree slope. Retain Rule 25(b).
368.5	HENDERSON Chris (Mrs)	Rule 25	Support	Retain.
369.15	HENDERSON Michael	Rule 25	Oppose	Increase in slope allowed to be mechanically cultivated based on sound research. Needs to be

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	changed to 2 times in 5 years to allow for a fodder crop and then to be resown back to permanent pasture.
374.2	High Country Farms Ltd	Rule 25	Amend	Increase the gradient-buffer zones. 0-10 deg with a 5m buffer zone. 11-20 deg and a 10m buffer zone. 21-35 deg and a 15m buffer zone. No mechanical cultivation over 35 deg. Up to + 4deg for each measurement as a lee way.
385.1	Hopcroft Dairies Ltd	Rule 25(a)(ii)	Amend	Cultivation could be permitted on a slope greater than 20% if it was sprayed and a direct drill used.
386.10	Hopcroft Farms Ltd	Rule 25	Oppose	<p>Equitable ruling for all property sizes.</p> <p>Clarify how the three year average is to be calculated? From which base year? What information/evidence would ES require to support or demonstrate areas previously cultivated?</p> <p>All references to areas or percentages of land holdings to be removed from the plan. The wintering of stock should be a permitted activity as long as the farm complies with their Farm Plan and GMP's.</p> <p>If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment.</p> <p>There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.</p>
387.15	HORRELL Andrew Russell	Rule 25	Amend	Amend to clarify how slopes will be measured and how this can be implemented on a farm level.
388.2	HORRELL Annette	Rule 25		More investigation needs to be done before the set back rule is implemented as many farmers will be at serious risk of loss of income and lack of choices for farming options.
390.30	Horticulture NZ	Rule 25	Oppose	<p>Amend Rule 25 as follows:</p> <p>a) The use of land for cultivation <u>and associated sediment control mechanisms</u> is a permitted activity provided the following conditions are met:</p> <p>... (i)(1) 3 metres from the outer edge of the bed on land with a slope <del>of less than 4 degrees (flat)</del> <u>under 10 degrees</u></p> <p>(i) (2) 10 metres from the outer edge of the bed on land with a slope between <del>4</del> <u>10</u> and 16 degrees...</p>
391.4	HOWE M A & B J	Rule 25(a)	Oppose	If it has been ploughed in the past it should be able to be ploughed again. Clarify what slopes are 20%.
392.3	HOWE Peter	Rule 25	Oppose	Remove 20 degree limit.



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394.4	HUDSON O F & S M	Rule 25	Oppose	Remove the 20m buffer zone on 16 degree slopes.
402.13	HUNT Alistair & Bernadette	Rule 25	Amend	Amend setback requirements as follows: 3m setback for slopes of less than 8 degrees. For slopes greater than 8 degrees, setback is calculated by slope minus 5 metres, up to a maximum of 20 metre setback for slopes of 25 degrees.  Cultivation should be allowed in a paddock where more than 50% of the paddock has a slope of 25 degrees or less. Where more than 50% of the paddock has a slope of greater than 25 degrees, cultivation of the lesser slopes is still allowed.
403.1	HUNTER Robert	Rule 25	Oppose	Delete Rule 25 and replace with seminars on correctly managing winter crops on steep areas.
404.1	HUNTER Thomas	Rule 25	Oppose	Allow land that has already been cultivated to continue being cultivated and perhaps no <u>new</u> development of land over 20 degrees.
405.2	Huntly Farm Partnership	Rule 25	Oppose	Would like to see more information from Environment Southland regarding this rule such as what does the consent look like and how long will it be granted for?
407.5	HYLAND Maureen	Rule 25	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
415.3	IRWIN Doug	Rule 25	Oppose	No specific decision requested.
417.2	J & K Stone Farming Ltd	Rule 25	Amend	I propose for a farm assessor/rep from Environment Southland to come on farm as assessor and make the rules more clear.  Clarify whether ponds are affected by the Rule.
417.3	J & K Stone Farming Ltd	Rule 25	Amend	Clarify how you determine a 20 degree slope over the land area concerned.
421.4	JAMES S T & K A Family	Rule 25		Clarify liability for slope over 20 degrees (contractor or farmer?).  Oppose cultivation not taking place more than once in a 5 year period.  Lift to 26-30 degrees. If no immediate waterway and small percentage of paddock with gradient greater this rule could be overlooked. 25 degrees more appropriate cutoff with in a paddock i.e. if 10% or 20% of a paddock is sloped over limit – allow cultivation anyway.

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				Allowing cultivation on steeper slopes at certain times of the year.
423.2	JANSSEN Mark & Martha	Rule 25	Oppose	Specify the winter grazing areas in percentage of total farm.
424.5	JARVIS Ben	Rule 25	Oppose	Remove limit on cultivation over 700 metres.
425.6	Jedburgh Station Ltd	Rule 25	Oppose	Remove rigid limits and each case must be considered individually both in terms of distance and slope.  Summer (cereal) and winter (forage) crops must be treated differently as must establishment and renewal of pasture.
426.5	JOHNSTON Allan & Robina	Rule 25	Support in part	Like the strategy of simplistic approach but disagree with quantity of metres. Impact is too great on a smaller than average NZ farm as us without any economic scale and balance of land types.  Clarify – why has Rule 25(b)(ii) – cultivation not met is only done in five year period.  Clarify why the 15% rule has been removed which was more palatable to most farmers and not contested?
429.5	JOYCE Nathan J & Julie L	Rule 25	Oppose	As an alternative I propose: Apply a 25degree slope policy for cultivating land. Small percentage areas of above 25 degrees should be allowed to be cultivated also for ease of management (e.g., a paddock that majority is <25degrees, but has 2% ground area of >30degrees should be permitted). A 4 metre buffer is ample for all situations. Remove requirement to map all drains.
432.1	KANE Rex	Rule 25	Oppose	Rule 25(a)(ii): Any planned cultivation or direct drilling on slope greater than 20 degrees should be included in the Farm Management Plan. There should be no need for a resource consent for this.
432.2	KANE Rex		Oppose	Rule 25(a)(i) 2 & 3: The limits in (2) and (3) should be a maximum of 5 metres and 10 metres respectively.
434.5	Kauana Dairy Ltd & Taffy Ltd	Rule 25	Oppose	No specific decision requested.
437.23	KEMPTHORNE Robert	Rule 25	Oppose in part	Remove the rule in its entirety or amend to put the onus back on the land owner to avoid the overland flow issues of sediment and contaminants. Let them make a risk based assessment on the likelihood of contamination and let them mitigate, avoid, manage as they see fit. If

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				they don't get it right Environment Southland has plenty of rules to pull them into line and/or fine them.
438.5	KENNEDY John	Rule 25	Oppose	The proposed maximum distance out from a bed is quite draconian and 10 metres maximum should be ample especially if a crop has been planted as the residual grass will be long and rank in the risk period of autumn/winter as long as it is ungrazed if a crop has been planted. If no crop then grazing in dryish weather should eliminate any issues. The banning of cultivation of 20 degree and above slope is unreasonable. Allow cultivation over 20 degrees depending on vegetation on the margins and distance to waterways.
441.1	KIDD Hamish & Fiona	Rule 25		We suggest that the clauses in Rule 25(b)(ii) and (iii) apply to the 20 degree slope aspect of Rule 25(a)(ii) as well, with the aim being making it a permitted activity when those (25(b)(ii) and (iii) are the situation.
444.4	KING Henry	Rule 25(a)(ii)	Oppose	Delete "mechanical cultivation on land with a slope greater than 20 degrees". There should be no restrictions.
445.2	KING R M & M J	Rule 25		I have concerns over the cultivation setbacks depending on slope. How will individual farmers be able to work out the degree of angle on a slope?
446.3	KINGSBURY Grant	Rule 25	Oppose	Remove limit on cultivation above 20 degrees. Replace 20-50ha limit with a percentage based approach.
450.5	Kmore Farming Ltd	Rule 25	Oppose	Had experience with buffer zones for last fifteen years, ten metres is big enough. Forty degrees would be better, past that direct drill or spry and pray would be options. Instead of consents, good management plans and practices and working with ES as a team or advice.
452.2	KNOWLER John & Wendy	Rule 25	Amend	Cultivation should be a permitted activity.
453.4	KNOWLER Rohan	Rule 25	Support	Agree with the above 700m rule but I do think it needs to be a farm by farm appraisal.
454.3	Kyler Pastorals	Rule 25	Amend	Should be re-worded-cultivation can take place twice in 10 years.
459.4	Lagore Enterprises Trust	Rule 25	Oppose	Exclude farmers who have good management practises already in place and areas of land well away from waterways.
461.4	LAMB Bruce & Gaye	Rule 25	Oppose	Encourage the use of a three metre grass buffer around flowing waterways, a 20m last bit strip around waterways and grazing down the hills towards the waterways.
462.1	LAMB George	Rule 25(a)	Oppose	Delete 20 degree cultivation limit.
463.3	LAMB Greg	Rule 25		Twenty degrees is unrealistic, recommend 25 degrees. Setback rules too complex, recommend a two-step rule.

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464.18	Landpro Ltd	Rule 25	Oppose	We seek a wording change to “ <u>from the top of outer bank</u> ” for 25(a)(i) (1) – (3). We seek that council refers to New Zealand Vertical Datum 2016. Amend the rule as follows: “cultivation does not take place more than once twice in any five-year period”
466.1	LAWRENCE Dave	Rule 25	Clarify	What evidence does council have to support the restriction in cultivation based on distance from waterway and slope. Clarify where the use of riparian planting modifies these restrictions. I believe steeper slope should be allowed based on riparian planting. Does cultivation apply to all types of ground work? Does direct drilling qualify as cultivation? Direct drilling has minimal disruption on soil structure. The degree of slope should be more generous.
469.7	LEGG Rob & Nessa	Rule 25	Oppose	<p>1. Cultivation should be allowed on these sorts of slopes or greater, provided good management practice is followed, without the need for submitting consent applications, which is a costly and time consuming process, these are two resources that many farmers need to manage carefully. At the very least, one consent issued for this activity should last for a long time, e.g. 10 years, again provided good management practice is followed. It would be highly unreasonable to have to go through the same consenting process each year.</p> <p>2. Farmers should have the ability to apply their good judgement in terms of setting buffer zones up when cultivating. This should be done for each situation and be flexible-bigger or smaller buffers are allowed for as they are needed. Again as long as good management practice is followed.</p>
470.3	LIETZE Janet & David	Rule 25(a)(i)	Oppose	<p>Height of hill needs to be taken into account for buffer zones. 3 metres to 5 metres should be the limit in most cases.</p> <p>If a 20 degree or more slope is a reasonable distance from a main water source or moves onto less sloping or flat ground it should be permitted to cultivate on.</p>
471.4	LINDSAY Chris	Rule 25	Oppose	No specific decision requested.
472.4	LINDSAY Jill	Rule 25	Support	Retain.
473.5	LINDSAY Ray	Rule 25	Support	Support with limits and more consultation.
474.5	LITTLE Robert Edsall	Rule 25	Oppose	<p>Delete all farming restrictions based on Physiological zones</p> <p>Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining &amp; improving water quality</p> <p>Due diligence should be from economic, social &amp; cultural view points</p>

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477.8	Longwood Properties Ltd	Rule 25	Amend	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.
478.21	LOVERIDGE David	Rule 25	Oppose	Significant changes need to be made, to make this rule practical.
480.6	Lowburn Ag Ltd (Jonathan Pemberton)	Rule 25(a)(ii)		Could this rule not be managed with better grazing plans as demonstrated by DairyNZ and Telford.
482.15	Lower Aparima Catchment Group	Rule 25	Oppose	<p>How is the three year average to be calculated? From which base year? What information/evidence would ES require to support or demonstrate areas previously cultivated?</p> <p>If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment.</p> <p>There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.</p>
485.1	M B Dillon	Rule 25	Oppose	<p>Rule 25(a)(i)(3): Distances should be reduced and, depending on time of year or plant going in or grazing.</p> <p>Rule 25(a)(ii): Remove 20 degree limit and individual circumstances should be considered.</p>
486.5	M Gardyne Ltd	Rule 25	Amend	Amend to include a maximum water catchment area of specified ha's on a 20 degree slope.
488.3	MACDONALD Brian	Rule 25	Oppose	When working a paddock how do you know if it is 16 degrees or 20 degrees?
492.5	MACKAY Alexander	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
493.5	MACKENZIE Toni	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
494.3	MACKINTOSH Alistair	Rule 25	Amend	Remove slope limit from Rule 25.
495.2	MACLEOD Neil	Rule 25		Remove the 20 degree angle. Remove the 20 or 50 hectare rule.

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496.4	MACPHERSON Chanelle	Rule 25	Oppose	No specific decision requested.
498.5	MANN Alistair	Rule 25	Oppose	Remove Rule 25 and replace with Management Plans.
502.4	MARSHALL Allan & Kathryn	Rule 25	Oppose	Encourage the use of a 3m grass buffer around flowing waterways, a 20m last bite strip around waterways and grazing down the hills towards the waterways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
503.5	MARSHALL Logan	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
505.5	MARSHALL Norman	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.6	MARSHALL R C	Rule 25	Oppose	Remove rule (a) (i) 2&3. Amend rule (a) (i) to remove any references to slope. Strongly oppose rule (a) ii, remove from plan.
507.4	MARSHALL Spencer	Rule 25	Oppose	Encourage the use of a 3m grass buffer around flowing waterways, a 20m last bite strip around waterways and grazing down the hills towards the water ways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
508.2	Martyn Farming Ltd	Rule 25	Oppose	Cultivation should be a permitted activity on slopes greater than 20 degrees if outside the required setbacks. An average should be calculated for areas with varying degrees of slope.
509.4	Matai Farms Ltd	Rule 25	Oppose	Cultivation on sloping ground should be permitted activity providing farmer takes practical steps to reduce risk of runoff.
510.6	Mataura Butcher Shop Ltd	Rule 25	Oppose	Make permitted.
511.3	MCCALL Ashley John	Rule 25	Oppose	Delete restrictions over 20 degrees and replace with no virgin country over 25 degrees to be cultivated without consent.
512.1	MCCALL Doug & Nikki	Rule 25	Oppose	Seek to amend: (i) (1) 3 metres from the outer edge of the bed on land with a slope of less than 4 degrees (flat) up to 10 degrees.
517.5	MCDONALD Colin & Dot	Rule 25(a)	Oppose	Allow spraying on slopes over 20 degrees.

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518.10	MCDONALD Stuart & HALDER Robyn	Rule 25(a)(ii)		Delete the reference to mechanical cultivation not being permitted on land with a slope greater than 20 degrees. Leave this to individual discretion of the farmer.  Delete the slope rules and replace with one standard three metre limit.
521.5	MCEWAN Trevor & Anthea	Rule 25	Amend	As an alternative we propose - Examine cultivation buffers as part of our FEP and determine buffers that are appropriate for our property in partnership with ES. This would replace any need for resource consent.
524.3	MCINTYRE Craig & Rebecca	Rule 25	Support	I do agree with the part of this rule that states cultivation does not occur above 700 metres above mean sea level. I do not agree with the part of this rule that states no mechanical cultivation on land with a slope greater than 20 degrees (moderately steep).
525.5	MCINTYRE Hayden	Rule 25	Oppose	The areas need to be either a percentage of landholding or based on stock units. 20m buffer strip on 16 degree slope is unworkable. The 20 degree cultivation rule is unworkable and would lead to significant areas on the farm that would not be able to winter on. A better idea would be no new uncultivated ground over '20' degrees not be allowed to be cultivated which is a significant part of our property.
526.5	MCINTYRE Peter Lindsay	Rule 25	Amend	Amend 20 degree limit to over 25 degrees, the land owner is able to cultivate without a consent but is required to have a plan and mitigation steps in place to address the risk of soil loss. This is customisable to the situation eg: the slope piece is a long way from any waterway, there is a large flatter area at the base, there is a larger set back area, or there is a shelter belt or sediment trap in place.  My preferred outcome is this rule applies to named lakes only.
527.5	MCKAIN Belinda	Rule 25	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
528.3	MCKAY A S & D E	Rule 25	Oppose	The ruling on this needs to be done farm by farm in a discretionary and common sense approach.
529.3	MCKAY Alistair	Rule 25	Amend	Discuss further with farmers. We agree that steep land should not be cultivated but we also do not agree with so much "red tape" being implemented into farming. This would also need to be looked at as a case by case.
532.3	MCKEE M & C Family	Rule 25 a(i)	Amend	Amend to: 3m up to 16 degrees, 10m up to 30 degrees and 20m more than 30 degrees.

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	Partnership			
533.4	MCKEE Rebecca	Rule 25	Oppose	We would need to have specific definition of waterways before we could comment further.
536.13	McKelvie Ltd	Rule 25(a)(ii)	Oppose	Delete the provision preventing mechanical cultivation on slopes greater than 20 degrees and replace with grazing management on slopes.
537.7	MCKENZIE G & T Partnership	Rule 25	Oppose	Delete.
538.6	MCKENZIE Hayden	Rule 25	Support Amend	<ul style="list-style-type: none"> <li>• Land/Intensive Winter grazing area that has been classified as deep cultivation i.e. ploughing, should require a buffer zone compared to direct drilling/spray and pray where no new ground disturbance has occurred.</li> <li>• Buffer zones should be evaluated on a case by case basis. For example if there is riparian along a waterway a need for a buffer zone should be reconsidered.</li> <li>• If there is an intensive winter grazing management plan in place buffer zones should be reconsidered for these areas.</li> <li>• Should be able to discuss the farm management plan around appropriateness of buffer zones, with an Environment Southland employee, through the cost of normal rates instead of having to apply for more resource consents.</li> </ul>
539.5	MCKENZIE Matthew	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
540.2	MCKERCHAR Farm Partnership	Rule 25 (a)(i)	Amend	Instead of 20 degrees, I think it should be 40 degrees plus with 3 metre set back.
543.1	MCLEAY Ewen	Rule 25	Amend	<p>Change rule so can cultivate land in middle of paddock.</p> <p>Cultivation setbacks should be on a one on one basis. Every farm is different so someone comes out to check if ok or not.</p>
544.2	MCLEOD Bruce & Cynthia	Rule 25	Support	Retain.
547.12	MCMULLEN G F	Rule 25	Oppose	Delete.
548.5	MCMULLEN Leith	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultural viewpoints.
550.1	MCNAMEE T W & J N	Rule 25	Oppose	Farms with a sound farm management plan and proven track record of no sediment loss issues be allowed to cultivate ground greater than 20 degrees, when less than 20m from a waterway and below 700m altitude.  Include the ability to control non-native obnoxious weeds.
551.2	MCPHAIL Glen	Rule 25	Oppose	Far more practical ways to reduce runoff on slopes such as grazing methods (as shown in management plans). Much of the land has been cultivated already, maybe no 'new' land over 20 degrees to be developed up to a maximum of 25-28 degrees.
552.3	MCPHAIL Neil	Rule 25	Oppose	Remove all restrictions on slopes for cultivation.
553.10	McPhelzo Trust (C G & M P Pullar)	Rule 25	Amend	Remove requirement for a resource consent and instead examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for the property in partnership with Environment Southland and operate a H&S plan.
554.11	McPhelzo Trust (Z, E & P Pullar)	Rule 25	Amend	Remove requirement for a resource consent and instead examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for the property in partnership with Environment Southland and operate a H&S plan.
555.14	MCRAE Daryl & Ruth	Rule 25	Amend	As an alternative we propose: It is a permitted activity to cultivate land with a slope greater than 20 degrees if it has been previously cultivated. Our Farm Environment Plan will outline appropriate buffer zones, classes of stock to be grazed, stocking rates and good management practices. This would replace the need for resource consents.
556.7	MCRAE Joe	Rule 25	Oppose	Increase angles to 10, 30 and 45 degrees. These could be suggested as best practice, rather than enforced, as how are we meant to measure this. I farm with a changing contour. So much is down to interpretation. Make these guidelines/best practise as measuring is near impossible.
557.6	MCRAE Matt	Rule 25	Oppose	Increase angles to 10, 30 and 45 degrees. Make these guidelines/best practise as measuring is near impossible.
558.10	MCRAE Natalie	Rule 25	Oppose	Amend the clause simply to read: Rule 25 – Cultivation on sloping ground: (a) The use of land for cultivation is a permitted activity provided the cultivation does not take place within the bed of a lake, river, natural wetland, modified watercourse, or artificial watercourse and a distance of 3 metres from the outer edge of the bed.

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559.3	MCRAE Neroli	Rule 25	Oppose	Consultation and review is needed to ensure this is manageable and effective. Research needed as to the long term effects.
560.8	MCRAE Tim & Justine	Rule 25	Oppose	Yes step land should not be winter cropped on, but this figure needs to be higher than 20 degrees.
561.2	MENLOVE William	Rule 25	Oppose	Make cultivation of ground above 20 degrees a permitted activity. Stay with status quo and put emphasis on education and good practice not consent, auditing and compliance.
563.5	MEYER Timothy	Rule 25	Oppose	Delete all farming restrictions based on Physiological zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural view points
564.12	Mid-Aparima Catchment Group	Rule 25	Oppose	If you are not within 100m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment. There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.
565.4	MIDDLETON Lindsay	Rule 25(a)	Oppose	Re-address this entire Rule with specific attention to the degrees of slope rules and better clarification of the rules for cultivating.
567.1	MILLER Geoffrey	Rule 25	Amend	Setback from waterways no more than 3 metres on any slope. Twenty five degree limit on cultivation. Allow small areas within a paddock when less than 20% of the paddock is sloped over limit.
568.3	MILLER N & L J Family Trust	Rule 25	Oppose	Remove restrictions for cultivation on sloping ground.
569.9	MILLER R J Trust		Oppose in part	We seek clarity from ES regarding Rule 25(a) on the basis that there are many unknowns. The rule should read from the outer bank which would be a more accurate measure of the slope on the paddocks next to waterways.  The rule 25(b)(ii) permits cultivation to occur within the setback distance once in five year period, however this does not allow a crop to be sown in rotation i.e. pasture to brassica but not back into pasture. We seek the rule reads as follows: "Cultivation does not take place more than twice in any five year period which will enable an area to be re-sown into grass without the need for a permit.
570.17	MILLER R L & S J Farm	Rule 25	Support in part	Change the slope rules to be the same as for intensive winter grazing (i.e.) 3m setback for slopes <8 degrees, 5m setback for slopes 8-20 degrees, 7m setback for slopes >20 degrees.

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	Trust			Clarify (b).
571.5	MILLER Susan	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
574.5	MITCHELL G B & M D	Rule 25	Amend	Remove buffers and rely on best practice. Common sense around grazing near creeks.
575.1	MITCHELL Keith	Rule 25	Oppose	Remove 20 degree limit.
576.5	MOIR Joseph	Rule 25	Oppose	Remove the 20 degree limit.
578.5	Moonlight Trust	Rule 25	Oppose	Delete (a) (i) (3).
581.5	MORRIS Lenore	Rule 25	Oppose	Rule 25(a)(ii): There should be no limit on altitude for cultivation and there should be a limit of 35 degrees on cultivation.
582.5	MORRIS Peter & Norina	Rule 25	Oppose	Three metres from edge of waterway for Rule 25 (a) (i) (1,2&3). Rule 25 – there should be no limit on altitude for cultivation. There should be no limit on altitude for cultivation and there should be a limit of 35° on cultivation.
583.22	MOSEBY Ryan	Rule 25(a)(i)	Amend	Disagree with cultivation distances. Oppose no cultivation of land with greater than 20 degree slope. Amend to reflect standard farming practice.
584.2	Moss Lane Ltd	Rule 25	Oppose	Reduce waterway setback margins.
586.10	MOUAT Family Trust	Rule 25	Support	Retain.
587.2	MOUAT James	Rule 25		Buffer zone need to be smaller and or degree of slope higher.
590.10	Mt Linton Station	Rule 25	Oppose	Delete ‘or mechanical cultivation on land with a slope greater than 20’.  Delete ‘cultivation not more than 1 in 5 year period.’  Delete Rule 25(b)(iii).
592.5	Mt Peel Ltd	Rule 25	Oppose	The slope of ground should be irrelevant as long as the correct procedures are followed. If correct buffers and grazing management practices are adhered to by working with E.S.’s land sustainability team we will be able to keep waterways clean and still be able to winter our capital stock. Spray and Pray and Direct Drilling promote a lot less soil disturbance and therefore lessen the risk of overland flow compared to full cultivation – these along with different grazing patterns and correct buffers are systems we could use in this steeper country

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				and create a win/win for all involved.
595.5	MURRAY Rex	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
597.3	NAPPER Mary & FINDLAY Allan	Rule 25	Amend	Change the statement to read: Mechanical cultivation on land with a slope greater than 20 degrees (moderately steep) is allowed providing the operator of the mechanical apparatus considers it is a safe environment and cultivation does not take place within 20 metres from the outer edge of the bed.
598.6	Newton Slink Skins	Rule 25	Oppose	Make permitted.
599.3	NEWTON T W & L M	Rule 25	Oppose	Delete.
602.1	Nightcaps Contracting Ltd	Rule 25	Oppose	Amend to allow mechanical cultivation on land with a slope greater than 45 degrees (moderately steep).
603.7	Nithdale Station	Rule 25		As long as the water quality coming out of those paddocks/blocks over the duration the land is under cultivation (from permanent pasture to permanent pasture) is acceptable then any cultivation is a permitted activity.  Alternatively, as long as the average slope of the block to be cultivated was under 20 degrees and the appropriate setbacks were adhered to adjacent to the waterways then this would be a permitted activity.  The intention is that soil does not get into the waterbodies. Therefore, as long as this was not happening then this clause should be removed.  Any mitigation against soil getting into the waterbodies is highlighted in the Cultivation section in the Farm Management Plan.
603.8	Nithdale Station	Rule 25(b)		I propose clause 25 (b) (iii) should also include cereal crops for harvesting, conservation or grazing.
604.5	Nokomai Station Ltd	Rule 25	Oppose	Wording change to “from the outer bank” for 25(a)(i) (1) – (3).
605.2	Noremac Ag Ltd	Rule 25	Oppose Amend	The rule should relate to a percentage of total landholding, my suggestion 15 – 20% total landholding as a permitted activity. Will contractors/staff know 20 degrees who will take responsibility if an area is cultivated? Support farmers to make the right decisions around

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultivation on their own farms.
606.4	Norham Farm Ltd	Rule 25(a)	Oppose	<p>Land with contour 20° - 30° should be able to be cultivated as long as potential nutrient run off is being appropriately managed and the stock grazing the winter crop on this type of area is sheep only as they will create less soil disturbance during the feeding off of the crop.</p> <p>Over sowing of steep country with chemical spraying, spray and pray sowing methods or minimal tillage should be allowed as long as the intensive winter grazing of this crop is limited to sheep due to the minimal soil disturbance this stock class creates.</p> <p>Over sowing of steep country with chemical spraying, spray and pray and minimal tillage techniques for planting into pasture should be a permitted activity.</p>
608.1	NORTON Emily	Rule 25	Oppose	Keep the 3m rule and remove the 10 and 20 metres.
609.5	NZ Deer Farmers Association – Southland Branch (Richard Cook)	Rule 25		Clarify for Rule 25: How distances from water bodies for non-cultivation (set-backs) are calculated. How the 700 m altitude limit is determined.
613.5	NZ Groundspread Fertilisers Association Inc.	Rule 25	Oppose	No specific decision requested.
615.4	O'CONNELL Dennis	Rule 25	Oppose	No specific decision requested.
616.8	O'CONNELL Elizabeth	Rule 25	Oppose	<p>That there be only two setbacks: up to 10 degrees with a 3m setback, &amp; above 10 degrees with a 10m setback.</p> <p>That the slope calculation and setback be measured 'along the ground' from the waterway rather than to a point being 20m from a horizontal distance from the waterbed, which cannot be measured with the accuracy implied by a three tier regulation.</p> <p>A need for tolerance around slope and setback measurements to acknowledge the difficulties in measuring and the practicalities of cultivating in hill country.</p> <p>Cultivating up to 25 degrees be a permitted activity.</p> <p>That a tolerance be made for small areas of a paddock which may be over 25 degrees such that it would be dangerous or practically difficult to work around.</p>

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				Retain (a)(ii). Change 'once' to 'twice' in (b)(ii).
622.25	P F Olsen Ltd	Rule 25	Support Amend	Retain Rule 59 (error in submission – should be Rule 25) in its entirety, but clarify in the definitions that post-harvest slash raking in forestry does not constitute Cultivation on Sloping Ground. The prime reason being that forestry codes require the maintenance of setbacks, the raking still retains slash on the site to perform the function of sediment control and the soil surface will be disturbed but not cultivated.
625.3	Parawa Ltd		Support	Rule 25(a)(ii): Shouldn't be any lower but higher than this runs into a higher slope and sensitive waterways. Amend to "slope greater than 25 degrees". Suggestion: block average slope instead say 75% under 25 degrees and 25% leeway.
626.3	PATERSON L J & S M	Rule 25		I think all ground already worked about the 20 degree slope should be allowed to continue to be worked.
627.6	PATERSON Ross	Rule 25	Amend	Rule 25(a)(i): Three metres up to 16 degrees, 10m over this angle. Stock can be kept back further through winter.  Rule 25(a)(ii): Thirty degrees at the least. All land cultivated in the past should be able to be cultivated in future. Setbacks and good management. Not cultivated more than two years in a row.
628.7	PATERSON Stephanie	Rule 25	Amend	Rule 25(a)(i): These setbacks are too large resulting in too much lost grazing area. Three metres < 16 degrees and greater over this angle. Stock can be kept further back through winter.  Rule 25(a)(ii): Change rule to 30 degrees at the very least. All land cultivated in the past should be permitted to be cultivated in the future. Setbacks and good management to be used and not cultivated more than 2 years in a row.
630.5	PATTULLO Pauline	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
633.1	PERKINS Aron Glyn	Rule 25(a)(ii)	Oppose	Delete 20 degree limit and replace with greater than 45 degrees.
637.2	PINCKNEY Edward, MACGILLIVRAY Craig & STIRLING Paul	Rule 25	Oppose	With implementation of a farm environment plan best practice these slope limits could be increased.
638.5	Pinnacle Farming Company Ltd	Rule 25(a)(ii)	Amend	Rather than a percentage gradient, a set of management plans to set rules for appropriate cultivation of steeper slopes. Recognising that technology is developing new better ways of cultivation.
641.4	POYNTZ-ROBERTS David	Rule 25	Oppose	Oppose – make less difficult to determine.
642.6	PREBBLE Lynden	Rule 25	Oppose Amend	As an alternative I propose: Land steeper than 20 degrees should be allowed to be cultivated after examining it within the farm environmental plan. The plan can include mitigating practices as required.
643.6	PREBBLE Sandra Jessie	Rule 25	Oppose Amend	As an alternative I propose land steeper than 20 degrees should be allowed to be cultivated after examining it within the farm environmental plan. The plan can include mitigating practices as required.
645.6	PRICE William	Rule 25	Oppose	Remove rule (a) (i) 2 & 3. Amend rule (a) (i) 1 to remove any references to slope. Strongly oppose rule (a) ii, remove from plan.
646.4	Progress Valley Farms Ltd	Rule 25	Oppose	A far more sensible approach would be to encourage the use of a 3m grass buffer around flowing waterways, a 20m last bite strip around waterways and grazing down the hills towards the water ways. A sediment trap could also be used as a means of showing how effective this is and catching any sediment that does escape off the paddock before it makes its way to the estuary.
650.4	PULLAR I J & K M	Rule 25	Amend	In situations where there is no creek below the angle of slope should be increased to 35 degrees.
652.7	PULLAR Mary	Rule 25	Oppose	Examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for my property in partnership with Environment Southland and continue to operate a H&S plan.
654.3	R D & J D Stewart Ltd	Rule 25	Oppose	Exclude sheep from rule altogether, but educate and monitor by good practice.
655.9	RABBIDGE Dean	Rule 25(a)	Amend	The cultivation of land should be allowed within 20 metres of waterways on a 10 degree slope, for winter crop, if grazed in favourable condition and for grass to grass to cultivation as this only happens on average every 15-20 years.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
656.7	RABBIDGE Stephen	Rule 25	Oppose	Delete.
659.4	Rathfriland Ltd	Rule 25(a)(ii)	Oppose	Increase this height to 900-1000m – (bushline). Do away with this rule altogether. Cultivation for the purposes of winter crop would only take place two times in a seven year cycle which is best farming practise anyway. Cultivation to regrass should not count.
660.3	RAUBER Kass	Rule 25	Oppose	Delete.
662.3	Rayonier NZ Ltd	Rule 25	Support	Retain.
666.17	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 25(a)(i)(3)	Support Oppose	Please redefine Rule 25 (a)(i)(3). Sixteen degrees seems too low to be practical. Remove consent requirement for land over 20 degrees in the paddock.
667.8	Riverfield Farms Ltd	Rule 25(a)(i)	Oppose	Replace varying slope and buffer numbers in Rule 25(a)(i) with a minimum buffer zone of 3 metres and then; 1 metre per degree of slope.  Rule 25(a)(ii): If not within 200 metres of a watercourse, then cultivation over 20 degrees is allowed as there is sufficient buffer zone within the 200 metres.
668.6	Riverdale Dairies Ltd	Rule 25(a)	Oppose	Replace Rule 25(a)(i) with a buffer of 1 metre per degree of slope with a minimum of a 3 metre buffer.  Rule 25(a): We think 25 degrees would be more suitable and would give better opportunity to contain weeds.
671.2	ROBERTS Andrew	Rule 25	Oppose	At a minimum, I wish to see some allocation be made in the rule, for the processes of zero tillage and direct drilling being a permitted activity, on slopes over 20 degrees. As some direct drills work by a means of ‘micro cultivation’ then in order to avoid misinterpretation of the rule, I believe there needs to be some allocation for ‘shallow cultivation’. This would need to be to a depth suitable for the plant species being drilled. I believe that the strategic cultivation of steep hill country can also have beneficial effects on the environment under current farming systems.
676.3	ROBINSON Brent	Rule 25	Amend	Reduce the 2 <sup>nd</sup> buffer band from 10 metres to 4 metres and the 3 <sup>rd</sup> buffer band from 20 metres to 5 metres. Cultivation up to 30 degrees be allowed if these slopes are grazed by sheep or small animals (R1 calves).
677.3	Robinson Dairies Ltd	Rule 25		Make permitted subject to good practices.
678.5	ROBINSON Jeffrey	Rule 25	Oppose	Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Delete the following from Rule 25 (a)(ii): “cultivation does not occur above 700 metres above mean sea level. <del>or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep).</del>  Delete Rule 25(b)(ii) and (iii).
679.5	ROBINSON Michael	Rule 25	Oppose	Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope. Delete the following from Rule 25 (a)(ii): “cultivation does not occur above 700 metres above mean sea level. <del>Or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep).</del> Delete Rule 25(b)(ii) and (iii).
681.14	Rockytommy Farming Ltd	Rule 25	Oppose in part	Clarify consenting process. Requires clarification around where the measurement is taken from or needs to be measured from (should be measured from the outer bank and not the highest point as rivers flood covers large areas of ground.
682.10	Rokenwai Farming Ltd	Rule 25	Oppose in part	Clarify consenting process. Requires clarification around where the measurement is taken from or needs to be measured from (should be measured from the outer bank and not the highest point as rivers flood covers large areas of ground and more clarification is needed regarding a 20 degree slope. These have varied greatly.
683.2	Ron J Stewart & Co	Rule 25	Oppose	Provide clearer guidelines about this rule. Does it exclude the whole paddock or just part that is above 20 degrees? All people should pay for the cost incurred due to this rule.
684.4	ROSE David	Rule 25	Oppose	Rethink setback distances and steepness of cultivation.
686.2	Rosehill South Ltd	Rule 25	Oppose	Delete Rule 25(a)(ii).
687.1	Roseneath Dairies	Rule 25(a)(ii), 25(c)	Amend	The rule needs to permit paddocks with small areas of 20 degrees + slope to be cultivated provided they comply with Rule 25(a)(i).
688.2	ROSS Garry	Rule 25	Oppose	16 degrees needs to be steeper like 45 degrees.
689.6	ROSS Keith		Oppose	Delete Rule 25(a)(ii).  Delete Rule 25(a)(i) 2 and 3 and amend rule (a)(i) 1 to remove any references to slope.
690.6	ROSS Warren	Rule 25	Oppose	Increase slope from 16 degrees to 45 degrees.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Full cultivation on already cultivated ground and a reduced level of cultivation on hill country development.
691.6	Rossland Farming Ltd	Rule 25	Oppose	Full cultivation on already cultivated ground and a reduced level of cultivation on hill country development.
692.6	ROWE Emma	Rule 25	Oppose	Please consider some clarification of where the degree of slope is measured from, is it from the edge of the waterway, bottom of the creek, or waterline to the top of the slope? or is it what the slope is which will vary a lot within a hill face. Is this taken into account or is it the slope as a whole?
693.7	ROY Bevan	Rule 25	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
694.5	ROY Bruce	Rule 25	Amend	Examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for my property in partnership with Environment Southland. This would replace any need for resource consents.
695.5	ROY James	Rule 25	Amend	As an alternative I propose: <ul style="list-style-type: none"> <li>Examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for my property in partnership with Environment Southland.</li> <li>This would replace any need for resource consents.</li> </ul>
696.3	RUDDENKLAU I & J	Rule 25	Amend	Twenty metres is too large an area to be left, 10 metres would be fairer but this area also should be allowed to be cultivated for re-grassing only.  Cultivation should be allowed up to 23 degrees.
697.5	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 25	Oppose	Delete.
699.5	Rural Livestock Ltd	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
700.4	Rural Solutions Ltd	Rule 25		I think the rules related to slope and set backs are reasonable but I think the “once in five years to renew pasture” should also be applied to 20 degree slopes.

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707.1	SANSON Mark	Rule 25	Oppose	No specific decision requested.
710.8	Schrader Mains Ltd	Rule 25		Amend Rule 25(1)(i)(2) to 5m. Amend Rule 25(1)(i)(3) to 10m.
711.10	SCOTT G D & M M	Rule 25(a)	Oppose	Cultivation of slope greater than 20 percent, if not near a watercourse then why? Too difficult to determine percentage of slope. Remove cultivation limit of no more than once in any five year period.
714.5	SELLWOOD Luke	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
720.3	SHAW Robert	Rule 25	Amend	Would like slopes lifted.
721.4	SHEARING Dean	Rule 25(a)(ii)	Amend	More clarification on what a lake, river, natural wetland or watercourse are.
722.3	SHEARING Gordon	Rule 25	Amend	No specific decision requested – see original submission
726.7	Slattery Trust	Rule 25	Oppose	Delete requirement for consent to undertake cultivation activities.
727.3	SLOAN P J & J M	Rule 25(a)(ii)	Oppose	With good cultivation it is possible to achieve beneficial environmental and productivity on slopes greater than 20 degrees. No restriction should be applied when waterways are not threatened.
728.5	Slope Point Farms Ltd	Rule 25	Oppose	Allow for farmers to manage these zones and graze these areas when weather permits without letting stock in the waterways.
730.6	SMALLEY Timothy	Rule 25	Oppose	The area of land taken out for excessive paddock borders would have a financial and physical impact on our farming systems.
731.8	SMITH Barry	Rule 25		Remove any references to maximum slope and frequency of working the areas up.
732.5	SMITH George & Kathryn	Rule 25		Should our General relief not be accepted, we submit that this rule is unreasonable as it is necessary to cultivate slopes greater than 20 degrees to re-grass. 3 metres is sufficient buffer zone and 10 metres maximum.
733.16	SMITH Hamish & Karen	Rule 25	Support in part	Amend Rule 25 to allow a certain percentage (e.g. 10-15%) of these steep (>20 degrees) slopes to be cultivated each year for the purpose of pasture renewal in order to maintain a productive farm and to reduce the influx of weeds and noxious plants due to the inability to control them readily.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
734.2	SMITH Warren	Rule 25	Oppose	Delete.
735.3	SMITH William	Rule 25		I feel it should be 25 degrees for sheep grazing.
736.1	Smithfield	Rule 25(a)(i)	Oppose	What does “outer edge of the bed’ mean in Rule 25(a)(i) 1,2,3? How do we measure these angles and degrees? The whole system you have created in these rules are going to be very hard to abide by and does not allow us to utilise our land to the best of its ability. To feed our stock we would need to use more paddocks because of your new rules. We definitely disagree with this rule.
737.21	Smithill Ltd	Rule 25		If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment. There is need for clarification around what is allowed if there is a small area present that is much steeper than the average slope. What is the science behind this whole rule in general? How is the 20 degree slope definitively calculated? What is the science behind the vegetative buffer zones? What is the science on no cultivation over 20 degrees?
738.4	Snowdon Downs	Rule 25	Oppose Amend	Lift to 26-30 degrees. If no immediate waterway and small percentage of paddock with gradient greater this rule could be overlooked. Cultivating soil on steep ground improves soil structure. 25 degrees more appropriate cut-off within a paddock i.e. if 10% or 20% of a paddock is sloped over limit – allow cultivation anyway. Allowing cultivation on steeper slopes at certain times of the year.
739.3	SOMERVILLE John	Rule 25	Amend	The rule lacks practicality and should have a larger range of setbacks as a guide to farmers. It should become a non-complying activity when the setbacks fail due to obvious disregard of guidelines and not because of extreme weather events.  The 20 degree rule needs to be applied to land of higher altitude and risk factor where the area of land that is 20 degrees or greater is of a sizable area within a paddock where it could cause high sediment loss risk in waterways if cultivated, not small areas in medium hill country where the risk is less and the steeper slope might only be a small percentage of the overall slope on the paddock.
744.3	Southern Farms NZ Ltd (Gene Bryce)	Rule 25	Support	Retain.
748.7	Southern View Ltd	Rule 25		I support the buffer rules for cultivation for crops but not if this includes re-grassing.
752.118	Southland Fish & Game Council	Rule 25	Support Amend	Retain Rule 25 as notified with the following amendments: “(a) The use of land for cultivation is a permitted activity provided the following conditions

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				<p>are met:</p> <p>(i) Cultivation does not take place within the bed of a <u>headwater seep / spring, tarn, intermittent / ephemeral streams with an active bed</u>, lake, river, natural wetland, modified watercourse or artificial watercourse within a distance of:</p> <p>(4) <del>3</del> <u>5</u> metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope of less than 4 degrees (<u>flat</u>) or <u>10m measured horizontally from the outer bed of a natural wetland or watercourse with trout and / or Inanga spawning habitat on land with a slope of less than 4 degrees (flat)</u>; and</p> <p>(5) 10 metres <u>measured horizontally</u> from the outer edge of the bed on land within a slope between 4 and 16 degrees (<u>rolling</u>); and</p> <p>(6) 20 metres <u>measured horizontally</u> from the outer edge of the bed on land with a slope greater than 16 degrees (<u>strongly rolling</u>); and</p> <p>(ii) Cultivation does not occur above 700m above mean sea level, or <del>mechanical cultivation</del> on land with a slope greater than 20 degrees (moderately steep).</p> <p>(b) The use of land for cultivation is a permitted activity provided the following conditions are met:</p> <p>(i) Cultivation does not take place within the bed of a <u>headwater seep / spring, tarn, intermittent / ephemeral streams with an active bed</u>, lake, river, natural wetland, modified watercourse or artificial watercourse <del>and</del> <u>within a distance of 3 5 metres measured horizontally</u> from the outer edge of the bed;</p> <p>(ii) Cultivation does not take place more than once in every five year period; and</p> <p>(iii) Cultivation is for the purpose of renewing or establishing pasture; and</p> <p>(iv) Cultivation does not occur above 700 metres above mean sea level <u>or on land with a slope of greater than 20 degrees (moderately steep)</u>.</p> <p>(c) . . .</p> <p><b><u>Environment Southland will restrict the exercise of its discretion to the following matters:</u></b></p> <p>. . .</p> <p>2. <del>The management of sediment and other contaminants from critical source areas</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Management practices, including the area and timing of cultivation, to avoid, remedy or mitigate the discharge of sediment and other contaminants to surface or ground water from critical source areas;</u></p> <p>3. <del>Risks to biodiversity and water quality and mitigation measures for addressing those risks</del>  <u>Risks to the following matters and measures to avoid, remedy or mitigate those risks:</u></p> <ul style="list-style-type: none"> <li>i. <u>Biodiversity, including aquatic habitat and areas of significant indigenous vegetation and significant habitats of indigenous fauna;</u></li> <li>ii. <u>Preservation of the natural character of wetlands, lakes, rivers and their margins; and</u></li> <li>iii. <u>The potential effects of cultivation on surface and groundwater quality and sources of drinking-water.</u></li> </ul> <p>4. Monitoring, inspection and audit requirements.  (d) Despite any other rule, the use of land for cultivation in the Alpine physiographic zone <u>or Coastal Marine Area</u>, is a <del>non-complying</del> <u>prohibited</u> activity.</p>
755.1	Southview Farm	Rule 25	Oppose	<p>This rule should be changed to</p> <ol style="list-style-type: none"> <li>1. Cattle should not be allowed to graze winter crops on slopes greater than 20 degrees.</li> <li>2. Slopes of greater than 20 degrees should be allowed to be cultivated, provided not more than 20% of the land area in the paddock is greater than 20 degrees and there is a 30 metre buffer between cultivated ground and any watercourse.</li> <li>3. Sheep only are to graze areas greater than 20 degrees in cultivated winter crops.</li> </ol>
756.1	Southview Ltd	Rule 25	Oppose	If a paddock has been cultivated before you should be able to continue this practice
758.1	South Wood Export Ltd, Kodansha Tree Farm Ltd & Southland Plantation Forest Co. of NZ	Rule 25	Support	<p>The submitter supports the proposed Rule 25 and seeks the following:</p> <ol style="list-style-type: none"> <li>(a) Clarification by way of advice note or redrafting, that the definition of “cultivation” does not include “stick raking”, a method commonly used by the forestry industry to control debris above ground;</li> <li>(b) Clarification by way of advice note or redrafting within Rule 25 that the restriction on cultivation on land with a slope greater than 20 degrees does not apply to aerial spraying (excluding spot spraying); and</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(c) Clarification by way of advice note or redrafting within Rule 25 that Environment Southland will consider, when deciding whether to grant consent under Rule 25(c), the importance of soil type, angle of cultivation and other specific controls employed by the applicant to prevent soil movement.
759.13	Springlands Group Ltd	Rule 25	Oppose in part	We seek clarity from ES regarding this Rule. Wording change to “ <u>from the top of outer bank</u> ” for 25(a)(i) (1) – (3).  We seek that Rule 25(b)(ii) reads as follows: “cultivation does not take place more than once twice in any five-year period”
761.12	STALKER Hanna & Callum	Rule 25	Oppose	If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment.  There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.
762.8	STANLEY Karen	Rule 25(a)	Amend	Amend to: 3 metre zone – up to 10 degree slope, 5 metre zone over 10 degree slope.
763.3	STARK W & S	Rule 25(a)(3)	Oppose	Cultivation of previously 20 degrees plus sloping cultivated ground shall be allowed providing a buffer zone of 10 metres be included.
766.7	STEVENS Brendon	Rule 25	Amend	Amend Rule 25(a)(ii) to include a provision to allow paddocks with small areas of greater than 20 degrees to be cultivated provided the setback rules are met as in Rule 25(a)(i). Amend Rule 25(b)(ii) so that cultivation can occur twice in a five-year period i.e. cultivate from grass into summer crop (turnips, plantain, chicory), then back into pasture within the current season/year.
767.8	STEVENS David	Rule 25		The proposed rule is too arbitrary in its approach and there should be a larger range of guidelines for sloping ground, with the responsibility put back on the farmer, with the understanding that any failure due to not following guidelines is a breach of the rule.
769.3	STEVENSON G V & B P	Rule 25	Amend	Greater degree of angle.
773.7	STEWART Rory	Rule 25	Oppose	Allow cultivation to occur between a five year period for certain circumstances. Change 20 degrees over a 20 metre area to 25 degrees over a 50 metre area.
774.7	STEWART Vanessa	Rule 25	Oppose	Make it simpler and consult more with farmers. Make it less of a financial burden on the farmers.
775.6	Stoney Creek Station Ltd	Rule 25	Oppose	Remove rule (a)(i) 2&3. Amend rule (a)(i)1 to remove any reference to slope. Strongly

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				oppose rule (a) ii, remove from plan.  We question the determination that land over 20 degrees is moderately steep.
776.2	STRANG Matthew	Rule 25	Oppose	I oppose Rule 25. If this rule is imposed it will have a detrimental effect on the Management of our pastures and our ability to control noxious weeds which will therefore have an impact on the value of our land, the way we farm it and our stocking capacity as existing grass runs out. Is Environment Southland offering to financially compensate for lost income and land value?
779.5	Strathallan Trust	Rule 25	Amend	Provide A: Early plan of intensive grazing of stock May to September. B: Corresponding cultivation plan regards to slope.
781.1	STRINGER Dougal	Rule 25(a)(ii)	Oppose	Remove the restriction on cultivation of land over 20 degrees OR provide relief for farmers with the majority of land over 20 degrees to compensate for devaluation in equity.
782.3	STRINGER Gay	Rule 25	Oppose	Suggest that land that has already been cultivated continue to be cultivated and that the restriction be on converting new land from native pasture by way of cultivation. The setback for cultivation should not be extensive-1m for slopes less than 16 degrees and 3m for slopes over 16 degrees, as for some farms this could involve a large area of land going out of production.
783.4	STRINGER Joe	Rule 25	Oppose	Clarify whether it can be shown that working this land is causing siltation/degradation of our rivers and waterways? Whether it can be pinpointed to any specific locations in southland where this run off is occurring/localised/or prominent? Is this more an issue of the nutrients applied to this category of land running off? Has the current riparian buffer strips between sloping ground and rivers been inadequate or ineffective against reduction or preventing runoff? Do we have supporting data to show this? If so has it been shown that increasing the distance will stop or prevent it. How will this be policed? What extra cost will the ratepayers incur for policing?
784.2	Sunnyside Station	Rule 25	Oppose	Degrees of cultivation increased.
786.7	SUTHERLAND Kevin & Ann	Rule 25(a)	Amend	Examine cultivation buffers as part of my Farm Environment Plan and determine buffers that are appropriate for my property in partnership with Environment Southland. This would replace any need for resource consents.
787.5	SUTHERLAND Richard	Rule 25	Oppose	Land already cultivated should be the base on rolling country. Perhaps this needs to be on a farm to farm basis.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Rule 25(a)(ii): Does a small slope of 20 degrees plus mean a complete paddock can't be cultivated. This is a bit vague and needs to be defined and 20 degrees needs to be out to 25 degrees.</p> <p>Rule 25(b)(iv): Agree with the 700m limit.</p>
790.10	TAIT G R & J E & Waikawa Valley Trust	Rule 25	Oppose	Suggest the buffer zone system be implemented around waterways and the sloping and degree restrictions deleted.
791.5	TALBOT Jeanette	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
792.27	TAYLER Matthew	Rule 25	Oppose	<p>I believe ES should apply the previously agreed hill and high country provisions across all physiological zones.</p> <p>Setbacks as detailed in submission for winter grazing.</p> <p>Amend Rule 25(a)(ii) from “not occur above 700m” to “not occur in the alpine zone”.</p> <p>Alternatively, remove reference to 700m and rely on Rule 23(d).</p> <p>Remove word “biodiversity from Rule 25(c)(2).</p> <p>Retain Rule 25(b)(i), (ii) and (iii) but remove rule 25(b)(iv) above 700m and instead rely on Rule 25(d).</p>
793.5	TAYLER Phillip	Rule 25	Amend	<p>Create an equivalent rule for forestry or reduce the focus on farming.</p> <p>Restrict steep country to sheep/deer/calves. Three metre setback as provided previously in hill and high country, good management practices as opposed to 20 metre setbacks.</p> <p>Remove Rule 25(a)(ii) and replace with “no cultivation in Alpine zone.” Replace Rule 25(b)(iv) with “no cultivation in Alpine zone.”</p>
795.3	TAYLOR George	Rule 25	Amend	Some flexibility is required. Discolouration of waterways in times of high rainfall should not potentially be an offence.
796.5	TAYLOR Marcy	Rule 25	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
801.4	Terrace Farm Trust & Johnrey Trust	Rule 25		A simple practical formula, with scientific backing should be developed and replace the current set back angles.  Under good farm management, away from waterways, steeper parts of the farm should be able to be cultivated.
802.27	The 254 Partnership & Gerken Family Trust	Rule 25	Oppose	Oppose permitted activity limit of 20 degrees. Farmers need to be allowed to cultivate twice in a 12 month period for the practicality of farming. Increase to 27 degrees.
807.6	The Terraces Ltd	Rule 25	Oppose	Remove rule (a) (i) 2&3. Amend rule (a) (i) 1 to remove any reference to slope. Strongly oppose rule (a) ii, remove from plan.
808.4	THOMAS Alison & Roger	Rule 25	Oppose Amend	That the farmer shows ways of mitigating sediment loss in land management plan – in cultivation.
810.37	Three Rivers Catchment Group (TRCG)	Rule 25	Oppose	Delete Rule 25(a) (i)(1), (2) and (3).
812.5	TIDEY Allan	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
813.8	Tihaka Farms	Rule 25(a)(ii)	Amend	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.
814.7	Timothy Farms Ltd	Rule 25(a)	Oppose	We suggest moving the 20 degree limit in Rule 25(a)(ii).  Rule 25(c) will be burdensome for our business if discretion is not advanced.
816.6	TIPPETT Christie	Rule 25(a)	Oppose Amend	Amend the rule so that a 3m buffer is required from the outer edge of the bed of any surface waterbody regardless of the slope. Delete the following from Rule 25(a)(ii): “cultivation does not occur above 700 metres above mean sea level <del>or mechanical cultivation on land with a slope greater than 20 degrees (moderately steep).</del> ”  Delete Rule 25(b)(ii) and (iii).
817.24	Tomogalak Gorge Trust	Rule 25	Amend	Should add another bracket of 20-25 degree slope with a buffer of 30 metres to be an allowed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Jeffery Keen)			activity before a consent is required. A larger buffer zone would be fine. Reword the clause to be 'does not take place more than two consecutive cultivations every 10 years'.
818.25	Tomogalak Gorge Trust (John Keen)	Rule 25	Amend	Should add another bracket of 20-25° slope with a buffer of 30m to be an allowed activity before a consent is required. Reword the clause to be "does not take place more than two consecutive cultivations every 10 years".
819.23	Tomogalak Gorge Trust (Linzi Keen)	Rule 25	Amend	Should add another bracket of 20-25degree slope with a buffer of 30m to be an allowed activity before a consent is required. A larger buffer zone would be fine. Reword the clause to be "does not take place more than two consecutive cultivations every ten years."
821.5	TOSH David	Rule 25	Oppose	No specific decision requested.
822.5	Tremaine Farming Partnership	Rule 25		The average slope from waterway should be measured from the outer edge of the bank rather than the outer edge of the bed.  Rule 25 (a)(ii) should be set at a greater slope than 20 degrees if a rolling paddock is being cultivated. If the area to be cultivated is a consistent slope of greater than 20 degrees, for say over half the paddock, then cultivation should not be permitted but small areas in a rolling paddock that are over 20 degrees should still be able to be cultivated. This could be covered in the farm management plan.
824.6	Tulloch Farm Glendhu Ltd	Rule 25	Oppose	Remove (a)(i) 2 and 3 and amend (a)(i) 1 to remove any reference to slope. Delete (a)(ii).
825.6	Tulloch McNab Transport Ltd	Rule 25	Oppose	Remove rule (a)(i)(2) and (3) and amend rule (a)(i)(1) to remove any references to slope and delete rule (a)(ii).
826.4	TURNER Jonny	Rule 25	Oppose	Delete the rule to ban cultivation on slopes greater than 20 degrees.
827.6	TURNER Paul & Kayleen	Rule 25	Oppose	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 where it is not above a waterway and would give better opportunity to contain weeds. Clarification of "outer edge of bed"
828.5	Twin Farm Ltd	Rule 25(a)(ii)	Oppose	Increase the slope to at least 30degrees and increase the distance over which the average slope is measured to at least 50 metres. And Over 30 degrees allow 'spray and pray' or direct drilling, grass to grass, as this will not expose the bare dirt to allow soil wash, so would therefore not reduce soil quality. Other types of

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cultivation over 30 degrees should require a consent.
832.87	VAN GOOL Raewyn	Rule 25	Oppose	Better to leave it to CSM which is a requirement of the FMP.
833.6	VAN ROOIJEN Marcel	Rule 25	Oppose	We recommend a buffer of 1 metre per degree with a minimum of a 3 metre buffer. We think 40 degrees would be more suitable. Clarification of the “outer edge of bed”.
834.5	VAN ROSSUM Winy & Maarten	Rule 25	Amend	Where the rule states “cultivation does not take place more than once in any five year period”, we would like this rule amended to state, “cultivation does not take place more than once in a 3 year period”. Please refer to our submission point on rule 23 for more detailed information regarding this amendment where 3 years relates to 30% winter grazing, as this area would need to be regressed to keep that area economically viable to our business.
835.5	VAN ZYL Hendrik	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.5	VAN ZYL Michelle	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
840.8	W & B Clarke & Son Ltd	Rule 25(a)(i)		We suggest remaining with the current 3m setback for all slopes.
842.8	Waihoaka Holdings Ltd	Rule 25(a)(ii)	Amend	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.
845.4	WALLACE Bruce & Maree	Rule 25	Amend	Clarify whether <20% is over 700M? Provide flexibility to be able to double crop or replace grass if damage due to pest/drought.
846.3	WALSH Brian	Rule 25	Oppose	16 degrees is too low; how the hell can you tell if 16 or 15 when ploughing; 16° is near flat.
847.2	WALSH Kerri	Rule 25	Oppose	Amend to make the degree of slope steeper.
851.3	WEIR Darren	Rule 25	Oppose	The limit should be extended out to 25 degrees.
853.3	WEIR Victoria	Rule 25	Oppose	We think that it should be extended out to 25 degrees.
854.4	WELLER Grant & Bernie	Rule 25	Support Amend	Replace with a sliding scale for setbacks i.e. slope 20 degrees setback 15 metres, slope 15 degrees setback 10 metres.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
855.2	WELLS A R & J R Family Trust	Rule 25	Oppose	Too tough on the hill country farmers on the 20 degree rule. Amend to be similar to the Peat/Old Mataura with adjustments (Rule 23). Add extra 5% for every ha after 300ha.  Amend to allow a 15-20 year time frame to complete fencing.
856.6	West Range Farms Ltd (Bronwyn Chamberlain)	Rule 25	Oppose	I would prefer to see a simple rule where all possible care should be taken to protect water quality.
857.6	West Range Farms Ltd (Derek Chamberlain)	Rule 25	Oppose	I would prefer to see a simple rule where all possible care should be taken to protect water quality.
860.4	WHITE John (Richard)	Rule 25(a)(i)	Amend	Amend to: <ul style="list-style-type: none"> <li>• Retain</li> <li>• 5 metres from edge of the bed on land with a slope between 4 &amp; 10 degrees.</li> <li>• 10 metres from .....a slope between 10 &amp; 16 degrees</li> <li>• 20 metres from ..... a slope between 16 % 20 degrees.</li> </ul>
861.22	WHITE John Copeland	Rule 25	Oppose	If you are not within 500m of a waterway and there is flat land to act as a buffer, you should be able to cultivate over 20 degrees as there is minimal risk of runoff of sediment.  There needs to be clarification around what is allowed if there is a small area present that is much steeper than the average slope.
863.3	Whiterig Dairy Farm	Rule 25	Neutral	Provide the science behind the buffer zones, 20 degree slope and 5 year cultivation limit.
864.7	Whyte Partnership	Rule 25	Amend	Cultivation on sloping ground limit needs to be lifted to 25 degrees or an average of 20 degrees over the ground that is cultivated, also the amount of setback on sloping ground for cereal cropping needs to be reduced.
865.6	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 25	Amend	Increase the slope allowance to 28 degrees.  Permitted activity where sustainable practice/s are included such as: Cultivation round the fill 20m buffer zone around the foot of the paddock Graze from the top of the paddock down Have a run off paddock right next door so 3-4hr on crop then take off Restricting the class of stock used to graze cultivated areas over 20 degrees

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Use of a back fence and portable troughs.  Give a ruling on how this exclusion will work per paddock e.g. if 70% of the paddock is over 28 degrees the paddock cannot be cultivated. Give a ruling on how these areas/farms will be assessed or identified and who will do this assessment.
866.3	WILKINS Brendan	Rule 25	Oppose	Change the slope rules to be the same as for intensive winter grazing i.e. 3m setback for slopes < 8 degrees, 5m setback for slopes 8-20 degrees and 7m setback for slopes > 20 degrees.
867.5	WILKINS Donna	Rule 25		Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
868.19	Wilkins Farming Ltd	Rule 25	Support in part	Relax rule (a)(ii) to 30 degrees. Relax rule (b)(ii) to cultivation to be allowed to 4 times in 10 years.
873.5	WILLIAMSON James	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
875.6	Willowbank Farms 2015 Ltd & Avondale Dairies	Rule 25	Oppose	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'.
877.50	WILSON Aaron	Rule 25	Support in part	Rules 25(a)(1)(2)(3)(ii) are ambiguous and need to be better defined so as to be simplified. FMPs should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.
879.4	WILSON Kerry	Rule 25	Oppose	No specific decision requested.
880.54	WILSON Shannon	Rule 25	Support in part	Rules 25(a)(1)(2)(3)(ii) are ambiguous and need to be better defined so as to be simplified. FMPs should be the cornerstone of this W&L plan and take precedence over a consenting regime.
881.4	Windyridge (Fleming) Ltd Farm	Rule 25	Amend	Amend so that the 20 degree slope limit be change to 30 or that the over 20 be set back from the waterway with buffer zones set out in 25a(i)(1)(3). If the decision is to insist on requiring consent on any cultivated areas over 20, to avoid having consent for each individual paddock would you consider a consent plan for the whole farm and then advise ES which paddocks

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				are to be cultivated each season?
883.3	WING Darren & Jenny	Rule 25	Oppose	Have no slope limit.
884.5	WINTER Amy	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
885.4	WINTER Graham & Robin	Rule 25		Replace the 20-50ha limits with a percentage criteria so less fertile land, more percentage of total farm permissible.
887.2	Woodslea Downs Farm Ltd	Rule 25	Oppose	20 degrees limit on cultivation – 25 degrees more appropriate cut off with allowance for small areas within a paddock e.g. if less than 10% or 20% is sloped over the limit, allow cultivation anyway.
890.5	WRIGHT Lindsay Family Trust	Rule 25	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
893.5	YOUNG A R & R B Partnership (Roseanne Young)	Rule 25	Oppose Amend	Instead of set limits for buffer zones in cultivated areas, farmers could work with Environment Southland to determine buffers appropriate for their property. This would be outlined in their Farm Environment Plan.
894.3	YOUNG Robert	Rule 25	Amend	Land that is greater than 20 degrees slope can be cultivated as long as it is less than 10 percent of the paddock, and at least 20 metres from waterways.

### Rule 26 – Discharges from on-site wastewater systems

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.92	Aratiatia Livestock Ltd	Rule 26	Support	Retain.
152.16	Clover Bell Ltd	Rule 26	Support Amend	We would like to see part (b)(6)(5) amended to read '20 metres of any permeable drain'.
156.10	COCKBURN Grant & Rachel	Rule 26	Amend	Clarify if there is existing systems that are causing a more than minor negative effect on water quality, and if there are then existing on-site wastewater systems that are below par should be upgraded within an appropriate timeframe (3-5 years).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
192.11	DALE P T & S B Trust	Rule 26	Oppose	These are already managed when they are installed i.e. as per instructions and signed off. No need to meddle with the current system. Current regulations on new properties should ensure or prevent failures. No need to double up on other regulators.  Delete Rule 26(b).
197.8	DEVINE Wade	Rule 26	Neutral	A common sense approach is required to comply with the intent of this rule. Clauses (vi) will not be possible in extreme wet weather events and should be modified to take account of adverse weather events. Encourage local councils to allow and provide pumped grey water disposal to networked sewerage systems especially in semi built up areas.
265.89	Federated Farmers of NZ (Southland Province)	Rule 26(a)(viii); 26(b)(vi)(4); 26(d)(viii)(6)	Oppose	Amend to read: <u>The discharge does not occur within the microbial health protection zone of any drinking water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
279.72	Forest & Bird NZ	Rule 26	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
330.14	Gore District Council, Invercargill City Council and Southland District Council	Rule 26	Amend	Amend Rule 26 as follows: <b>Rule 26 – Discharges from on-site wastewater systems</b> (a) The discharge of treated domestic wastewater, onto or into land in circumstances where a contaminant may enter water from an existing on-site wastewater system is a permitted activity provided the following conditions are met: (i) the on-site wastewater system had been installed and was operational prior to 1 June 2016; (ii) the discharge does not exceed 1,250 litres per day, averaged over a period of one month; (iii) the discharge <u>to the system is consistent</u> <del>consists only of contaminants normally associated</del> with domestic wastewater; (iv) the on-site wastewater system is not used for the disposal of wastewater from chemical toilets; (v) there is no faecal contamination of any take of water for human consumption as a result of the discharge; (vi) there is no <del>discharge above the soil surface, or</del> direct discharge to



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>groundwater, surface water, an artificial watercourse or the coastal marine area, including discharge via tile drains, stormwater drains, artificial free draining areas such as soak holes and overland flow;</p> <p>(vii) the inflow or infiltration of stormwater, other surface water and groundwater to the system is minimised;</p> <p>(viii) the discharge does not occur within the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J.</p> <p>(b) The discharge of treated domestic wastewater, onto or into land in circumstances where a contaminant may enter water from a new on-site wastewater system or a replacement of an existing system is a permitted activity provided the following conditions are met:</p> <p>(i) the treatment and disposal system is designed and installed in accordance with Sections 5 and 6 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and</p> <p>(ii) the treatment and disposal system is operated and maintained in accordance with the system’s design specification for maintenance or, if there is no design specification for maintenance, Section 6.3 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and</p> <p>(iii) the discharge does not result in wastewater <del>ponding being visible</del> on the ground surface; and</p> <p>(iv) the discharge does not contain any hazardous substance.</p> <p>(v) the on-site wastewater system is not used for the disposal of wastewater from chemical toilets;</p> <p>(vi) the discharge is not within:</p> <ol style="list-style-type: none"> <li>(1) 20 metres of any surface waterbody or artificial watercourse, excluding interception drains which benefit the on-site wastewater system;</li> <li>(2) 50 metres of the coastal marine area or any natural state waters; or</li> <li>(3) 50 metres of any bore or well used for potable or stock water supply;</li> <li>(4) the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>250 metres of the abstraction point of a drinking water supply site identified in Appendix J; or</p> <p>(5) 20 metres of any tile drain. Proposed Southland Water and Land Plan Page 56</p> <p>(vii) <u>the discharge does not exceed 14,000 litres a week;</u></p> <p>(viii) <u>the discharge to the system is consistent with domestic wastewater;</u></p> <p>(ix) <u>the system is designed so that:</u></p> <p>(1) <u>the soil beneath the soil infiltration surface is maintained as free draining to a depth of at least 600 millimetres; and</u></p> <p>(2) <u>the bottom of the soil infiltration surface is no less than 900 millimetres above the mean seasonal high groundwater table and any perched water.</u></p> <p>(c) The discharge of treated domestic wastewater, onto or into land in circumstances where a contaminant may enter water from an on-site wastewater system that does not meet the conditions of Rule 26(a) or (b), is a discretionary activity.</p> <p>(d) The discharge of septage onto or into land, in circumstances where a contaminant may enter water, and any associated discharge to air from an on-site wastewater system is a permitted activity provided the following conditions are met:</p> <p>(i) the discharge occurs on the same landholding as the on-site wastewater system is located;</p> <p>(ii) the discharge consists only of contaminants normally associated with domestic wastewater.</p> <p>(iii) the on-site wastewater system is not used for the disposal of wastewater from chemical toilets;</p> <p>(iv) there is no faecal contamination of any take of water for human consumption as a result of the discharge;</p> <p>(v) the maximum depth of septage application is 7 mm;</p> <p>(vi) no other effluent is discharged to the septage application area for 28 days before and 28 days after the septage application;</p> <p>(vii) the discharge onto or into land does not occur at a location where overland flow will result in contaminants reaching surface water;</p> <p>(viii) the discharge is not within:</p> <p>(1) 20 metres of any surface waterbody or artificial watercourse;</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>(2) 50 metres of the coastal marine area or any natural state waters; or</li> <li>(3) 100 metres of any bore or well used for potable or stock water supply;</li> <li>(4) 100 metres of any landholding boundary;</li> <li>(5) 200 metres of any school, marae, or residential dwelling other than residential dwellings on the landholding;</li> <li>(6) the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J;</li> <li>(ix) there is no direct discharge to groundwater, surface water, an artificial watercourse or the coastal marine area, including discharge via tile drains, stormwater drains, artificial free draining areas such as soak holes, and overland flow;</li> <li>(x) the discharge does not result in any emission of odour that is offensive or objectionable at or beyond the boundary of the landholding ;</li> <li>(xi) the discharge does not occur on a site less than 100 hectares in area <u>and is limited to a total area of XXX in any year.</u></li> <li>(xii) <u>the application is managed to reduce the risk of vector attraction.</u></li> </ul> <p>...</p>
337.16	Growplan Ltd	Rule 26		While there is focus on traditional septic systems will you consider making it easier to install composting systems? <further comment>
349.4	HAMILTON N J & R H & Manapouri Station	Rule 26	Oppose	No specific decision requested.
387.16	HORRELL Andrew Russell	Rule 26	Support	Retain.
510.7	Mataura Butcher Shop Ltd	Rule 26	Oppose	Make permitted.
598.7	Newton Slink Skins	Rule 26	Oppose	Make permitted.
640.39	Pourakino Catchment Group	Rule 26	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
658.1	Ralph Moir & Associates	Rule 26(b)		<p>Rule 26(b)(i) should be amended by the addition of the words “...<u>or any replacement standard.</u>”</p> <p>Add the words “...<u>or any replacement standard.</u>” to Rule 26(b)(ii)</p> <p>The term hazardous substance should either be defined in the glossary in such a way that it is clear what is meant or the wording should be amended to read “...contains only domestic wastewater.”</p> <p>Delete (b)(vi)(5) or amend to exclude those cases where the drain is specifically related to the wastewater system.</p> <p>Add a clause to rule 26(b) that sets a daily discharge limit on a monthly average of 2000L.</p>
666.18	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 26	Support	Retain.
725.5	Silver Fern Farms Ltd	Rule 26	Support	Retain.
750.15	Southland District Council	Rule 26	Amend	<p>“(b) The discharge of treated domestic wastewater, onto or into land in circumstances where a contaminant may enter water from a new on-site wastewater system or a replacement of an existing system is a permitted activity provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) <u>The discharge does not exceed 14,000 litres per week; and</u></li> <li>(ii) the treatment and disposal system is designed and installed in accordance with Sections 5 and 6 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and</li> <li>(iii) the treatment and disposal system is operated and maintained in accordance with the system’s design specification for maintenance or, if there is no design specification for maintenance, Section 6.3 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and</li> <li>(iv) the discharge does not result in wastewater being visible on the ground surface; and</li> <li>(v) the discharge does not contain any hazardous substance.</li> <li>(vi) the on-site wastewater system is not used for the disposal of wastewater from chemical toilets;</li> <li>(vii) the discharge is not within: <ul style="list-style-type: none"> <li>(1) 20 metres of any surface waterbody or artificial watercourse, excluding interception</li> </ul> </li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>drains which benefit the on-site wastewater system;</p> <p>(2) 50 metres of the coastal marine area or any natural state waters; or</p> <p>(3) 50 metres of any bore or well used for potable or stock water supply;</p> <p>(4) the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J; or</p> <p>(5) 20 metres of any <del>tile drain</del> <u>subsurface drainage system</u>.</p> <p><u>(viii) the system is designed so that :</u></p> <p>(1) <u>the soil beneath the soil infiltration surface is maintained as permeable / freely draining to a depth of at least 600 millimetres; and</u></p> <p>(2) <u>the bottom of the soil infiltration surface is no less than 900 millimetres above soil characteristics associated with the mean seasonal high groundwater table and any perched water.”</u></p> <p>Amend the reference to ‘potable’ water as follows:</p> <p>(vi) the discharge is not within ...</p> <p>(3) 50 metres of any bore or well <del>used for potable or stock water supply;</del></p> <p>Amend wording of rule 26(f) as follows:</p> <p>“Despite Rule 26(a) to (e), the discharge of untreated domestic wastewater, raw sewage <u>from on-site wastewater systems</u>, or effluent from mobile toilets, into surface or groundwater is a prohibited activity.”</p>
752.119	Southland Fish & Game Council	Rule 26	Amend	<p>Retain.</p> <p>BUT</p> <p>Amend all references to tile drains to refer to “<u>sub-surface drainage systems</u>”.</p> <p>Amend all references that refer to distances from any surface waterbody to provide:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				“. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . .”
793.6	TAYLER Phillip	Rule 26	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal. Standards of rule 26 need to be comparable to NES for drinking water and swimmable.
797.41	Nga Runanga and TRONT	Rule 26	Support in part	Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaītai reserve or taiāpure</u> .
810.38	Three Rivers Catchment Group (TRCG)	Rule 26	Support	Retain.
832.88	VAN GOOL Raewyn	Rule 26	Support	Retain.

#### Rule 27 – Discharges from pit toilets

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.93	Aratiatia Livestock Ltd	Rule 27	Support	Retain.
279.73	Forest & Bird NZ	Rule 27	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
510.8	Mataura Butcher Shop Ltd	Rule 27	Oppose	Make permitted.
598.8	Newton Slink Skins	Rule 27	Oppose	Make permitted.
750.16	Southland District Council	Rule 27(a)(v)(3)		Remove reference to Potable Water.
752.120	Southland Fish & Game Council	Rule 27	Support	Retain. BUT Amend all references to tile drains to refer to “ <u>sub-surface drainage systems</u> ”. Amend all references that refer to distances from any surface waterbody to provide: “. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . .”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
776.3	STRANG Matthew	Rule 27	Oppose	We are opposed to Rule 27 regarding Pit Toilets exceeding 320L a week. We are assuming that this will not be metered and if it is, is Environment Southland going to be covering the costs of this?
793.7	TAYLER Phillip	Rule 27	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal.
797.42	Nga Runanga and TRONT	Rule 27	Support	Retain Rule 27(f). Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaaitai reserve or taiāpure.</u>
832.89	VAN GOOL Raewyn	Rule 27	Support	Retain.

#### Rule 28 – Discharges of liquid from waterless composting toilet systems

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.94	Aratiatia Livestock Ltd	Rule 28	Support	Retain.
265.90	Federated Farmers of NZ (Southland Province)	Rule 28(a)(v)(4)	Oppose	Amend to read: <u>The discharge does not occur within the microbial health protection zone of any drinking water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
279.74	Forest & Bird NZ	Rule 28	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
337.17	Growplan Ltd	Rule 28		Urine separation is now possible with these systems and needs to be taken into account
510.9	Mataura Butcher Shop Ltd	Rule 28	Oppose	Make permitted.
598.9	Newton Slink Skins	Rule 28	Oppose	Make permitted.
750.17	Southland District Council	Rule 28(a)(v)(3)		Remove reference to Potable Water.
752.121	Southland Fish & Game Council	Rule 28	Support	Retain. BUT Amend all references to tile drains to refer to “ <u>sub-surface drainage systems</u> ”.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Amend all references that refer to distances from any surface waterbody to provide: “ . . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams, or artificial watercourse . . .</u> ”
793.8	TAYLER Phillip	Rule 28	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal.
797.43	Nga Runanga and TRONT	Rule 28	Support in part	Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaītai reserve or taiāpure.</u>
832.90	VAN GOOL Raewyn	Rule 28	Support	Retain.

### Rule 29 – Discharges of aerobically composted human excreta

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.95	Aratiatia Livestock Ltd	Rule 29	Support	Retain.
265.91	Federated Farmers of NZ (Southland Province)	Rule 29(a)(ix)(5)	Oppose	Amend to read: <u>The discharge does not occur within the microbial health protection zone of any drinking water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
279.75	Forest & Bird NZ	Rule 29	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
349.5	HAMILTON N J & R H & Manapouri Station	Rule 29	Oppose	No specific decision requested.
510.10	Mataura Butcher Shop Ltd	Rule 29	Oppose	Make permitted.
598.10	Newton Slink Skins	Rule 29	Oppose	Make permitted.
737.22	Smithill Ltd	Rule 29	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
750.18	Southland District Council	Rule 29 (a)(ix)(3)		Remove reference to Potable Water.
752.122	Southland Fish & Game	Rule 29	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			BUT Amend all references to tile drains to refer to “ <u>sub-surface drainage systems</u> ”. Amend all references that refer to distances from any surface waterbody to provide: “. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams, or artificial watercourse . . .</u> ”
793.9	TAYLER Phillip	Rule 29	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal
797.44	Nga Runanga and TRONT	Rule 29	Support in part	Amend (g): (g) the discharge does not take place into water within natural state waters, into waters subject to a water conservation order <u>or mātaītai reserve or taiāpure.</u>
832.91	VAN GOOL Raewyn	Rule 29	Support	Retain.

### Rule 30 – Discharges from mobile toilets

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.96	Aratiatia Livestock Ltd	Rule 30	Support	Retain.
279.76	Forest & Bird NZ	Rule 30	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
348.6	HAMILTON Blair	Rule 30	Amend	Without nominating a place to empty this is nonsense.
510.11	Mataura Butcher Shop Ltd	Rule 30	Oppose	Make permitted.
598.11	Newton Slink Skins	Rule 30	Oppose	Make permitted.
752.123	Southland Fish & Game Council	Rule 30	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
793.10	TAYLER Phillip	Rule 30	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal.
797.45	Nga Runanga and TRONT	Rule 30	Support	Retain.
832.92	VAN GOOL Raewyn	Rule 30	Support	Retain.

### Rule 31 – Dump stations

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.77	Forest & Bird NZ	Rule 31	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
510.12	Mataura Butcher Shop Ltd	Rule 31	Oppose	Make permitted.
598.12	Newton Slink Skins	Rule 31	Oppose	Make permitted.
752.124	Southland Fish & Game Council	Rule 31	Support	Retain.
780.5	Strathfair Farms	Rule 31		More dump stations are needed.
793.11	TAYLER Phillip	Rule 31	Amend	Targeted tourist rate to pay for tourism infrastructure/waste disposal.
832.93	VAN GOOL Raewyn	Rule 31	Support	Retain.

### Rule 32 – Effluent storage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.39	Alliance Group Ltd	Rule 32	Oppose	Amend Rule 32(b) to discretionary activity status.
24.97	Aratiatia Livestock Ltd	Rule 32	Oppose	We strongly advise the inclusion of IPENZ practice note 27 within this rule.
43.7	BAKER Shane & SHAW Wendy	Rule 32		Clarify what the implications are associated with a dated effluent consent ruling.
47.15	Balfour, Wendonside & Waikaia Group	Rule 32	Oppose in part	The rule be changed to “ <u>The use of land for the construction of any effluent storage pond and weeping wall</u> ” and that a building consent for an effluent tank is sought from the district council.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
92.11	Bristol Grove Dairies		Amend	Rule 32(a)(1): Instead of ancillary structures, rule should be for structures exceeding 30m <sup>3</sup> .  Rule 32(a)(i): Impractical and expensive to get a Chartered Professional Engineer because there are only three in Southland. Current pond regulations should be adequate.
133.6	Civil Tech Ltd	Rule 32	Amend	Rule 32(a)(i): Continue with the existing list of SQP's and with all future SQP's Environment Southland can decide on a case by case basis.
149.1	CLEMENT Peter	Rule 32		Rule 32(a)(iii) change dwelling to existing dwelling if a house is built after pond is established. Amend to 'new conversions' not existing.
152.17	Clover Bell Ltd	Rule 32	Support Amend	We would like to see this activity changed to a 'controlled activity'.
178.4	Crooks Dairy Ltd	Rule 32	Oppose	Rule 32(a)(i): Continue for ponds to be certified by civil engineers, not a chartered professional engineer.
189.37	Dairy Holdings Ltd	Rule 32		Amend Rule 32 as follows: a. The use of land for the construction of any effluent storage, including of waste-water, sludge or effluent from an industrial or trade processes or agricultural effluent, is a <del>restricted discretionary permitted activity</del> provided the following conditions are met: <i>[delete existing ]</i> i) <u>for agricultural effluent storage, the design and build process is certified by a suitably qualified person as being constructed of suitable materials and meeting the requirements of the IPENZ practice Note 21: Farm Dairy Effluent Pond Design and Construction 2013; and</u> ii) the effluent storage is not within <del>2550</del> metres of any surface waterbody, artificial watercourse or coastal marine area; iii) the effluent storage is not within <del>100200</del> metres of any dwelling not on the same landholding, or <del>2550</del> metres of the boundary of any other landholding; and iv) the effluent storage is not within <del>50400</del> metres of any water abstraction point Delete Rule 32(b) and replace with a new 32.b. (above the existing items of consideration for the current restricted discretionary rule): <u>The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a restricted discretionary activity</u>
190.15	DairyNZ	Rule 32	Support	Amend Rule 32(a)(1) to:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	<p>Matter of discretion</p> <p>Environment Southland will restrict its discretion to the following matters:</p> <p>1.the design and construction of the storage structures and ancillary structures <u>with a volume greater than 30m3</u></p> <p>Amend Rule 32(a)(i) to:</p> <p>(a)(i) For agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with <u>the applicable IPENZ Practice Note relating to Farm Dairy Effluent Pond Design and Construction (2013)</u>.</p>
192.12	DALE P T & S B Trust	Rule 32	Amend	Please consider ancillary structures such as Herd Homes not to be classified as a restricted discretionary activity and please consider people that have the skills to do this design work with the practicalities to go with it, but may not be Chartered Professional Engineers.
233.11	DYSON Valerie &Glyn	Rule 32	Support	Retain.
247.11	Environment Southland	Rule 32	Amend	<p>Amend Rule 32 to read:</p> <p>(a) The use of land for the construction of any effluent storage, <u>other than an onsite wastewater system, composting toilet system or mobile toilet, but</u> including of waste-water, sludge or effluent from an industrial or trade processes or agricultural effluent, is a restricted discretionary activity provided the following conditions are met:</p> <p>(i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction (2013); and</p> <p>(ii) the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding; and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>Insert a new condition to Rule 32(a) as follows:</p> <p>(v) the effluent storage is not within 50 m of any road boundary.</p>
259.12	F D Enterprises Ltd	Rule 32	Oppose in part	<p>I seek that wording include approved contractors or designers.</p> <p>I seek that the wording of the rule be changed to <u>““The use of land for the construction of any effluent storage pond, and weeping wall”</u> and that a building consent for an effluent tank</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				is sought from the district council.
264.9	FarmRight Ltd	Rule 32	Oppose in part	Amend: “The use of land for the construction of any effluent storage pond, and weeping wall” and that a building consent for an effluent tank is sought from the district council.
265.92	Federated Farmers of NZ (Southland Province)	Rule 32	Oppose in part	Remove “2013” from the Rule 32(a)(i). Amend 32(a)(1) as follows: 1. the design and construction of the storage and ancillary structures <u>above 30m</u> ; Delete 32(a)(6).
277.49	Fonterra Co-operative Group Ltd	Rule 32	Oppose in part	Amend rule to exclude storage mechanisms of less than 20,000L e.g. small sumps in the dairy shed and small stone traps.
279.78	Forest & Bird NZ	Rule 32	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
313.8	GILLESPIE Maria	Rule 32	Amend	That the agricultural effluent storage and design process be certified by a Professional Engineer.
314.6	Gladvale Farms Ltd	Rule 32	Oppose	The drop test conditions need to revert to old rules.  Delete Rule 32(a) – revert to previous rules or amend to make more practical – the mm amount should be 3mm per 24hrs.
333.3	Greenbush Farms Ltd	Rule 32	Amend	Put a size trigger in place to prevent capturing small storage facilities such as sumps and stone traps.
362.8	Hedgehope Grazing Ltd	Rule 32	Oppose	Provide a minimum size threshold. For example, all ancillary structures over 30 cubic meters.
372.9	Heritage NZ	Rule 32(a)	Support	Retain Rule 32(a) & associated matter of discretion 3.
408.2	Hynds Pipe Systems Ltd	Rule 32	Oppose	Rule 32 – Effluent storage (a) <u>The use of land for the construction of any effluent storage, including of waste-water, sludge or effluent from an industrial or trade processes or agricultural effluent, is a permitted activity where a building consent is obtained for that structure.</u> (a)(b) The use of land for the construction of any effluent storage, including of waste-water, sludge or effluent from an industrial or trade processes or agricultural effluent, is a <del>restricted discretionary controlled</del> activity provided the following conditions are met: (i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(ii) Note 21: Farm Dairy Effluent Pond Design and Construction (2013); and the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding; and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>(b)The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a non-complying activity.</p>
410.10	Invercargill Airport Ltd	Rule 32	Support	IAL does consider that the matters of discretion should ensure that adverse effects on the activities and operations of adjacent landholdings can be sufficiently considered.
412.1	IPENZ Engineers NZ	Rule 32		IPENZ notes and supports the reference in Rule 32 (Effluent Storage) to IPENZ Practice Note 21 Farm Dairy Effluent Pond Design and Construction. We recommend Environment Southland expands the scope of the Water & Land Plan to include the design of farm dairy effluent infrastructure, systems as well as effluent storage ponds. Where the design is complex, or potentially has significant safety or environmental risks, we recommend that the work be undertaken by a Chartered Professional Engineer.
422.1	JAMIESON Rebecca	Rule 32	Oppose	Clarify whether it relates to new or existing ponds?
433.7	Kapuka Dairies Ltd	Rule 32	Amend	Put a size trigger in place for when an engineer is required.
451.9	Knockinnon Farm Trust	Rule 32	Amend	Change from non-complying to discretionary.
464.19	Landpro Ltd	Rule 32	Amend	<p>We seek that the wording of the rule be changed to “<u>“The use of land for the construction of any effluent storage pond, and weeping wall.”</u>” and that a building consent for an effluent tank is sought from the district council.</p> <p>We seek that the requirement is for a ‘suitable qualified person’. Further justification of the Rule is sought.</p>
480.7	Lowburn Ag Ltd (Jonathan Pemberton)	Rule 32(a)		Remove requirement for engineer to be chartered.
498.6	MANN Alistair	Rule 32	Oppose	Amend the wording to: “The use of land for the construction of any effluent storage pond and weeping wall...”
510.13	Mataura Butcher Shop Ltd	Rule 32	Oppose	Make permitted.
569.10	MILLER R J Trust	Rule 32	Oppose in part	We seek that the wording of the rule be changed to the use of land for the construction of any effluent storage pond and weeping wall and that a building consent for an effluent tank is

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				sought from the district council.
598.13	Newton Slink Skins	Rule 32	Oppose	Make permitted.
614.20	NZ Transport Agency	Rule 32	Oppose	<p>(a) The use of land for the construction of any effluent storage, including of wastewater, sludge or effluent from an industrial or trade processes or agricultural effluent <u>excluding Stock Truck Effluent Disposal Sites</u>, is a <del>restricted discretionary</del> <u>controlled</u> activity provided the following conditions are met:</p> <p>(i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction (2013); and</p> <p>(ii) the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding; and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>(b) The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a <del>non-complying discretionary</del> activity.</p>
621.2	Otara Dairies Ltd	Rule 32	Amend	Put a size trigger in place for when an engineer is required.
638.6	Pinnacle Farming Company Ltd	Rule 32 (a)(iv)	Amend	If existing bore tests clear of contamination from effluent storage no change required.
638.7	Pinnacle Farming Company Ltd	Rule 32(a)(i)	Amend	Amend requirement for Chartered Professional Engineers.
640.40	Pourakino Catchment Group	Rule 32	Oppose	<p>(a) The use of land for the construction of any effluent storage, including of wastewater, sludge or effluent from an industrial or trade processes or agricultural effluent, is a <del>restricted discretionary</del> <u>controlled</u> activity provided the following conditions are met:</p> <p>(i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction (2013); and</p> <p>(ii) the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding; and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>(b) The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a <del>non-complying</del> <u>restricted discretionary</u> activity.</p>
647.8	Progressive Engineering Southland Ltd	Rule 32	Oppose	<p>(a) the use of land for construction of any effluent storage, including of waste-water, sludge or effluent from an industrial or trade processes or agricultural effluent, is a <del>restricted discretionary</del> <u>controlled</u> activity provided the following conditions are met:</p> <p>(i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction (2013) <u>including certification through the territorial building consent process;</u>and</p> <p>(ii) the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding;</p> <p>and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>(b) The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a <del>non-complying</del> <u>discretionary</u> activity.</p>
663.2	RD Agritech Ltd	Rule 32(a)	Amend	<p>Add an additional clause to Rule 32, to require that any clay lined effluent storage facility must be drop tested in accordance with the methodology set out in Appendix P, and meet the relevant pond drop level stipulated, within 12 months of completion of construction.</p> <p>Amend clause (a)(i) of Rule 32, to require that the storage design and build process for other types of effluent storage, is certified by a Chartered Professional Engineer as being in accordance with relevant standards and sound engineering principles and the current version of IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction.</p>
666.19	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 32	Amend	Use limits more appropriate to storage size.
692.7	ROWE Emma	Rule 32		There are only two certified engineers in Southland; will they be able to keep up with the workload?
697.6	Rural Contractors of NZ	Rule 32	Amend	All ponds to be lined with an approved liner other than clay.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Incorporated (Linda Stalker)			
712.31	Seaview Trust & Oraka Farms Ltd	Rule 32	Oppose	Recommend there needs to be a minimum size requirement for storage facilities as per the previous plan. Recommend Ancillary structures also need to be removed from the requirement for drop text.
726.8	Slattery Trust	Rule 32	Amend	Amend “chartered professional engineer” to read “a qualified engineer”.
737.23	Smithill Ltd	Rule 32	Amend	Remove "restricted" and change to "controlled". The effluent pond drop test is an unworkable test due to climatic conditions, and specific test requirements are not reasonably practicable. Why is drop testing not being mentioned in Rule 32?
740.4	South Coast Dairy Ltd	Rule 32	Amend	Clarify what structures need engineering input/put a size trigger in place.
750.19	Southland District Council	Rule 32	Support	Retain the approach that the agricultural effluent storage rule relates to any type of storage.
752.125	Southland Fish & Game Council	Rule 32	Support Amend	Amend Rule 32(ii) as follows:  (ii) The effluent storage is not within 50 metres of any <u>sub-surface drain</u> , surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , artificial watercourse or coastal marine area.  Amend all references to tile drains to refer to “ <u>sub-surface drainage systems</u> ”.  Amend all references that refer to distances from any surface waterbody to provide: “ . . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . . ”
759.14	Springlands Group Ltd	Rule 32	Oppose in part	We seek that the wording of the rule be changed to “ <u>The use of land for the construction of any effluent storage pond, and weeping wall</u> ” and that a building consent for an effluent tank is sought from the district council.
766.8	STEVENS Brendon	Rule 32	Amend	Amend the wording of the rule to “the use of land for the construction of any effluent storage pond, and weeping wall, and effluent tank.”
777.8	STRATFORD Chris & Lynsey	Rule 32	Neutral	Set people up for success. Delay the introduction of this requirement to allow a sufficient number of people to obtain the qualification. introduce a size trigger to identify that an engineer is not required to design smaller structures e.g. stone traps and sumps.
800.6	TEMPLETON Vaughan	Rule 32		Encourage adequate effluent storage not make the building costs a significant penalty.
810.39	Three Rivers Catchment Group (TRCG)	Rule 32	Oppose	(a) The use of land for the construction of any effluent storage, including of wastewater, sludge or effluent from an industrial or trade processes or agricultural effluent, is a <del>restricted discretionary</del> <u>controlled</u> activity provided the following conditions are met:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(i) for agricultural effluent storage the design, and build process, is certified by a Chartered Professional Engineer as being in accordance with IPENZ Practice Note 21: Farm Dairy Effluent Pond Design and Construction (2013); and</p> <p>(ii) the effluent storage is not within 50 metres of any surface waterbody, artificial watercourse or coastal marine area;</p> <p>(iii) the effluent storage is not within 200 metres of any dwelling not on the same landholding, or 50 metres of the boundary of any other landholding; and</p> <p>(iv) the effluent storage is not within 100 metres of any water abstraction point;</p> <p>(b) The use of land for the construction of any effluent storage that does not meet the conditions in Rule 32(a) is a <del>non-complying</del> <u>restricted discretionary</u> activity.</p>
811.22	THYS Herman & STAUT Tinneke	Rule 32	Oppose in part	<p>Delete the word “any”.</p> <p>Add; a volume of liquid i.e. 60,000l - above this volume a certified engineer needs to be involved.</p> <p>Add; provision that plenty of certified engineers need to be available before this requirement applies.</p>
823.1	TROTTER Bruce & VAN ROSSUM Winy	Rule 32	Amend	<p>Amend to exclude small storage facilities, i.e. sumps and stone traps.</p> <p>Amend Rule 32 (a)(i) to allow other engineers to design and certify ponds.</p>
831.4	VAN DER BIJL Willem	Rule 32	Oppose	Make signing off for effluent ponds simpler.
832.94	VAN GOOL Raewyn		Support Amend	<p>Include ETPract qualified certifier to Rule 32(a)(i), IPENZ 21 also recognises ETPract.</p> <p>Retain Rule 32(ii) to (iv).</p>
863.4	Whiterig Dairy Farm	Rule 32	Oppose	No specific decision requested.
879.5	WILSON Kerry	Rule 32	Amend	Amend to exclude weeping walls or sumps or stone-traps.

### Rule 33 – Community sewerage schemes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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275.4	FLETT Alan	Rule 33	Amend	An abatement notice to Councils to stop this and a system installed to apply effluent to land.												
279.79	Forest & Bird NZ	Rule 33	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.												
330.15	Gore District Council, Invercargill City Council and Southland District Council	Rule 33	Oppose Amend	<p>Amend Rule 33 as follows:</p> <p><b>Rule 33 – Community sewerage schemes</b></p> <p>a. The discharge of effluent or bio-solids onto or into land, in circumstances where contaminants may enter water, <del>or into a surface waterbody</del>, from a community sewerage scheme is a discretionary activity, <del>provided the following condition is met:</del></p> <p style="margin-left: 40px;"><del>i. any pond, tank or structure used to store the effluent or bio-solids prior to discharge is certified by a Chartered Professional Engineer as:</del></p> <p style="margin-left: 80px;"><del>1. meeting the requirements of the New Zealand Standard being structurally sound;</del></p> <p style="margin-left: 80px;"><del>2. meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P:</del></p> <table border="1" style="margin-left: 120px;"> <thead> <tr> <th>Maximum Depth of Pond (m) excluding freeboard</th> <th>Maximum Allowable Pond Level Drop (mm per 24 hours)</th> </tr> </thead> <tbody> <tr> <td>&lt;0.5</td> <td>1.2</td> </tr> <tr> <td>0.5 to 1.0</td> <td>1.4</td> </tr> <tr> <td>1.0 to 1.5</td> <td>1.6</td> </tr> <tr> <td>1.5 to 2.0</td> <td>1.8</td> </tr> <tr> <td>&gt;2.0</td> <td>2.0</td> </tr> </tbody> </table> <p style="margin-left: 40px;"><del>3. a replacement testing methodology is currently being developed by MWH and can be included in the submission prior to lodging it with Environment Southland</del></p> <p>b. <del>The discharge of effluent or bio-solids onto or into land, in circumstances where contaminants may enter water, or into a surface waterbody, from a community sewerage scheme that does not meet the condition of Rule 33(a) is a non-complying activity.</del></p> <p>c. <u>The discharge of raw sewage from a community sewage scheme, onto or into land, in circumstances where contaminants may enter water, or to surface water from existing network overflows is a discretionary activity.</u></p> <p>d. <u>The discharge of raw sewage onto or into land, in circumstances where contaminants</u></p>	Maximum Depth of Pond (m) excluding freeboard	Maximum Allowable Pond Level Drop (mm per 24 hours)	<0.5	1.2	0.5 to 1.0	1.4	1.0 to 1.5	1.6	1.5 to 2.0	1.8	>2.0	2.0
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				<p><u>may enter water, or to surface water from new network overflows is a discretionary activity provided:</u></p> <ol style="list-style-type: none"> <li>1. <u>The network is designed and operated so it does not overflow other than in wet weather situations; and</u></li> <li>2. <u>overflow points are designed and located so that discharges generate a minimum of nuisance, damage, public health risk, and ecological effects and do not cause scouring and erosion at the point of discharge.</u></li> </ol> <p>e. <u>The discharge of raw sewage onto or into land, in circumstances where contaminants may enter water, or to surface water not meeting rule 33 (d) is a non-complying activity.</u> Alternatively, change Rule 5.</p>												
411.31	Invercargill City Council	Rule 33	Oppose	<p>Amend Rule 33 as follows: <b>Rule 33 – Community sewerage schemes</b></p> <p>f. The discharge of effluent or bio-solids onto or into land, in circumstances where contaminants may enter water, <u>or into a surface waterbody</u>, from a community sewerage scheme is a discretionary activity, <del>provided the following condition is met:</del></p> <p><del>ii. any pond, tank or structure used to store the effluent or bio-solids prior to discharge is certified by a Chartered Professional Engineer as:</del></p> <ol style="list-style-type: none"> <li><del>4. meeting the requirements of the New Zealand Standard being structurally sound;</del></li> <li><del>5. meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P:</del></li> </ol> <table border="1" data-bbox="1160 837 1749 1161"> <thead> <tr> <th><b>Maximum Depth of Pond (m) excluding freeboard</b></th> <th><b>Maximum Allowable Pond Level Drop (mm per 24 hours)</b></th> </tr> </thead> <tbody> <tr> <td>&lt;0.5</td> <td>1.2</td> </tr> <tr> <td>0.5 to 1.0</td> <td>1.4</td> </tr> <tr> <td>1.0 to 1.5</td> <td>1.6</td> </tr> <tr> <td>1.5 to 2.0</td> <td>1.8</td> </tr> <tr> <td>&gt;2.0</td> <td>2.0</td> </tr> </tbody> </table> <p><del>6. [a replacement testing methodology is currently being developed by MWH and can be included in the submission prior to lodging it with Environment Southland]</del></p> <p><del>g. The discharge of effluent or bio-solids onto or into land, in circumstances where contaminants may enter water, or into a surface waterbody, from a community sewerage scheme that does not meet the condition of Rule 33(a) is a non-complying activity.</del></p> <p>h. <u>The discharge of raw sewage from a community sewerage scheme, onto or into land, in circumstances where contaminants may enter water, or to surface water from existing</u></p>	<b>Maximum Depth of Pond (m) excluding freeboard</b>	<b>Maximum Allowable Pond Level Drop (mm per 24 hours)</b>	<0.5	1.2	0.5 to 1.0	1.4	1.0 to 1.5	1.6	1.5 to 2.0	1.8	>2.0	2.0
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				<p><u>network overflows is a discretionary activity.</u></p> <p>i. <u>The discharge of raw sewage onto or into land, in circumstances where contaminants may enter water, or to surface water from new network overflows is a discretionary activity provided:</u></p> <ol style="list-style-type: none"> <li>3. <u>The network is designed and operated so it does not overflow other than in wet weather situations; and</u></li> <li>4. <u>overflow points are designed and located so that discharges generate a minimum of nuisance, damage, public health risk, and ecological effects and do not cause scouring and erosion at the point of discharge.</u></li> </ol> <p>e. <u>The discharge of raw sewage onto or into land, in circumstances where contaminants may enter water, or to surface water not meeting rule 33 (d) is a non-complying activity.</u></p>
510.14	Mataura Butcher Shop Ltd	Rule 33	Oppose	Make permitted.
598.14	Newton Slink Skins	Rule 33	Oppose	Make permitted.
644.2	Premier Dairies Ltd	Rule 33	Oppose	<p>I would like the following questions answered:</p> <ol style="list-style-type: none"> <li>1. What and how many issues have been found to suggest that there is a need for this ruling?</li> <li>2. Why are you moving to chartered engineers only in this area when this has never been a stipulation in the past? This again is only going to increase our costs and have no benefit to what you are saying that you want to achieve.</li> </ol>
663.3	RDAgritech Ltd	Rule 33	Amend	<p>Amend Rule 33(a)(i) to require that the Chartered Professional Engineer is a current “Council approved supplier of certification”. If required, add new Appendix covering certification requirements/assessment process.</p> <p>Amend Rule 33(a)(i)(2) to state that any pond, (or storage) that is subject to infiltration or otherwise experiences an increase in level that cannot be accounted for by direct rainfall, is considered as not meeting the relevant pond drop.</p>
664.21	Real Journeys Ltd	Rule 33		<p>Provide for water abstraction for intermediate size activities. That is activities between households and community water supplies.</p> <p>The plan needs to provide for discharges related to intermediate scale activities.</p>
730.7	SMALLEY Timothy	Rule 33	Oppose	Oppose due to perceived inaccuracy and volatility of the test.
750.20	Southland District Council	Rule 33	Amend	<p>“Amend the wording as follows:</p> <p>(a) The discharge of effluent or bio-solids onto or into land, in circumstances where</p>

				<p>contaminants may enter water, <del>or into a surface waterbody</del>, from a community sewerage scheme is a discretionary activity, <del>provided the following condition is met:</del></p> <p><del>(i) any pond, tank or structure used to store the effluent or bio-solids prior to discharge is certified by a Chartered Professional Engineer as:</del></p> <p><del>(1) being structurally sound;</del></p> <p><del>(2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</del></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th><del>Maximum Depth of Pond (m) excluding freeboard</del></th> <th><del>Maximum Allowable Pond Level Drop (mm per 24 hours)</del></th> </tr> </thead> <tbody> <tr> <td><del>&lt;0.5</del></td> <td><del>1.2</del></td> </tr> <tr> <td><del>0.5 to 1.0</del></td> <td><del>1.4</del></td> </tr> <tr> <td><del>1.0 to 1.5</del></td> <td><del>1.6</del></td> </tr> <tr> <td><del>1.5 to 2.0</del></td> <td><del>1.8</del></td> </tr> <tr> <td><del>&gt;2.0</del></td> <td><del>2.0</del></td> </tr> </tbody> </table> <p><del>(b) The discharge of effluent or bio-solids onto or into land, in circumstances where contaminants may enter water, from a community sewerage scheme that does not meet the condition of Rule 33(a) is a non-complying activity.<sup>22</sup></del></p>	<del>Maximum Depth of Pond (m) excluding freeboard</del>	<del>Maximum Allowable Pond Level Drop (mm per 24 hours)</del>	<del>&lt;0.5</del>	<del>1.2</del>	<del>0.5 to 1.0</del>	<del>1.4</del>	<del>1.0 to 1.5</del>	<del>1.6</del>	<del>1.5 to 2.0</del>	<del>1.8</del>	<del>&gt;2.0</del>	<del>2.0</del>
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752.126	Southland Fish & Game Council	Rule 33	Support	Retain.												
780.6	Strathfair Farms	Rule 33	Amend	Ponds should be 50 metres of any water body and 200 metres of any dwelling. The same as effluent ponds.												
820.10	TOPHAM Jeanette	Rule 33	Support	Retain.												

### Rule 34 – Industrial and trade processes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.40	Alliance Group Ltd	Rule 34	Oppose	Delete (i) and remove the non complying activity status for such activities.
52.5	Bathurst Resources Ltd	Rule 34		Reword Rule 34 so that it does not include discharges onto or into land from mining

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought												
				operations.												
279.80	Forest & Bird NZ	Rule 34	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.												
330.16	Gore District Council, Invercargill City Council and Southland District Council	Rule 34	Oppose Amend	<p>Amend Rule 34 as follows:</p> <p><b>Rule 34 – Industrial and trade processes</b></p> <p><del>a.</del> The discharge onto or into land, in circumstances where contaminants may enter water, or into a surface waterbody, of wastewater, sludge or effluent from industrial and trade processes, other than agricultural effluent, is a discretionary activity provided the following condition is met:</p> <p><del>i.</del> any pond, tank or structure used to store the waste water, sludge or effluent prior to discharge is certified by a Chartered Professional Engineer as:</p> <ol style="list-style-type: none"> <li><del>1.</del> being structurally sound;</li> <li><del>2.</del> meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P:</li> </ol> <table border="1" data-bbox="1155 719 1744 1034"> <thead> <tr> <th><i>Maximum Depth of Pond (m) excluding freeboard</i></th> <th><i>Maximum Allowable Pond Level Drop (mm per 24 hours)</i></th> </tr> </thead> <tbody> <tr> <td><del>&lt;0.5</del></td> <td><del>1.2</del></td> </tr> <tr> <td><del>0.5 to 1.0</del></td> <td><del>1.4</del></td> </tr> <tr> <td><del>1.0 to 1.5</del></td> <td><del>1.6</del></td> </tr> <tr> <td><del>1.5 to 2.0</del></td> <td><del>1.8</del></td> </tr> <tr> <td><del>&gt;2.0</del></td> <td><del>2.0</del></td> </tr> </tbody> </table> <p><del>The discharge onto or into land, in circumstances where contaminants may enter water, of wastewater, sludge or effluent from industrial and trade processes, other than agricultural effluent, that does not meet the condition of Rule 34(a) is a non-complying activity.</del></p>	<i>Maximum Depth of Pond (m) excluding freeboard</i>	<i>Maximum Allowable Pond Level Drop (mm per 24 hours)</i>	<del>&lt;0.5</del>	<del>1.2</del>	<del>0.5 to 1.0</del>	<del>1.4</del>	<del>1.0 to 1.5</del>	<del>1.6</del>	<del>1.5 to 2.0</del>	<del>1.8</del>	<del>&gt;2.0</del>	<del>2.0</del>
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342.7	H W Richardson Group	Rule 34	Oppose	Delete (i) and remove the non complying activity status for such activities.												
411.32	Invercargill City Council	Rule 34	Oppose	<p>Amend Rule 34 as follows:</p> <p><b>Rule 34 – Industrial and trade processes</b></p> <p><del>b.</del> The discharge onto or into land, in circumstances where contaminants may enter water, or into a surface waterbody, of wastewater, sludge or effluent from industrial and trade processes, other than agricultural effluent, is a discretionary activity <del>provided the</del></p>												

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought												
				<p>following condition is met:</p> <p>ii. any pond, tank or structure used to store the waste water, sludge or effluent prior to discharge is certified by a Chartered Professional Engineer as:</p> <p>3. being structurally sound;</p> <p>4. meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <table border="1" data-bbox="1155 443 1742 719"> <thead> <tr> <th><i>Maximum Depth of Pond (m) excluding freeboard</i></th> <th><i>Maximum Allowable Pond Level Drop (mm per 24 hours)</i></th> </tr> </thead> <tbody> <tr> <td>&lt;0.5</td> <td>1.2</td> </tr> <tr> <td>0.5 to 1.0</td> <td>1.4</td> </tr> <tr> <td>1.0 to 1.5</td> <td>1.6</td> </tr> <tr> <td>1.5 to 2.0</td> <td>1.8</td> </tr> <tr> <td>&gt;2.0</td> <td>2.0</td> </tr> </tbody> </table> <p>The discharge onto or into land, in circumstances where contaminants may enter water, of wastewater, sludge or effluent from industrial and trade processes, other than agricultural effluent, that does not meet the condition of Rule 34(a) is a non-complying activity.</p>	<i>Maximum Depth of Pond (m) excluding freeboard</i>	<i>Maximum Allowable Pond Level Drop (mm per 24 hours)</i>	<0.5	1.2	0.5 to 1.0	1.4	1.0 to 1.5	1.6	1.5 to 2.0	1.8	>2.0	2.0
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510.15	Mataura Butcher Shop Ltd	Rule 34	Oppose	Make permitted.												
598.15	Newton Slink Skins	Rule 34	Oppose	Make permitted.												
644.3	Premier Dairies Ltd	Rule 34	Oppose	<p>On ponds that are lined and on ponds that have leakage inspection points I really struggle to understand the need to go to this expense. It is like we are guilty until we prove ourselves to be innocent yet we have constructed our ponds to your specifications at huge initial costs. I am fully behind a clean green environment but you need to be practical in your expectations and use instruments that we already have in place to monitor these things.</p> <p>I would like the following questions answered:</p> <ol style="list-style-type: none"> <li>1. What and how many issues have been found to suggest that there is a need for this ruling?</li> <li>2. Why are you moving to chartered engineers only in this area when this has never been a stipulation in the past? This again is only going to increase our costs and have no benefit to what you are saying that you want to achieve.</li> </ol>												
663.4	RDAgriTech Ltd	Rule 34	Amend	Amend Rule 34(a)(i) to require that the Chartered Professional Engineer is a current “Council												



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				approved supplier of certification”. If required, add new Appendix covering certification requirements/assessment process.  Amend Rule 34(a)(i)(2) to state that any pond, (or storage) that is subject to infiltration or otherwise experiences an increase in level that cannot be accounted for by direct rainfall, is considered as not meeting the relevant pond drop.
664.22	Real Journeys Ltd	Rule 34		Provide for water abstraction for intermediate size activities. That is activities between households and community water supplies.  The plan needs to provide for discharges related to intermediate scale activities.
725.6	Silver Fern Farms Ltd	Rule 34	Support	Retain.
730.8	SMALLEY Timothy	Rule 34	Oppose	Oppose due to perceived inaccuracy and volatility of the test.

### Rule 35 – Discharge of agricultural effluent to land

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
6.2	ADAMS Jules	Rule 35		Pads should be unlimited in number.
7.5	AdBest Partnership	Rule 35		One feed pad per farm permitted, what is the rationale behind this?
13.4	All In Ltd	Rule 35	Oppose	Changing the limit to one feed lot/wintering pad per 100Ha.
24.98	Aratiatia Livestock Ltd	Rule 35	Oppose	Remove reference to the “28 days” in rule 35(x) and instead incorporate a return interval table that is specific to each physiographic zone.
25.30	Ardel Dairies Ltd	Rule 35 (b) (ii)	Oppose	Allow multiple feed pads.
26.13	Ardoyne Farm Dairys	Rule 35		Amend so testing is only required for effluent ponds and no need to test effluent ponds if they have been suitably designed and built by a qualified person to required standards.
47.16	Balfour, Wendonside & Waikaia Group	Rule 35	Oppose in part	Amend to: 5. “the adequacy of information provided to demonstrate that any pond, tank <del>or structure</del> used to store agricultural effluent prior to discharge does not leak;” and 6. “the structural integrity of any pond, tank <del>or structure</del> used to store agricultural effluent prior to it being discharged.”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>We seek the addition of Old Mataura Zone in Rule 35(c) and that the timing is amended to be consistent with the rest of the plan i.e. 30 May 2016.</p> <p>Retain Rule 35(1)(i)(4) – (error this should read 35(a)(i)(4).</p> <p>Amend Rule 35(a)(xii) ‘the location of any <u>known</u> sub-surface drains within the discharge area and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.’</p> <p>Amend Rule 35(b)(iii) any pond, <u>or</u> tank or <del>structure</del> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: (1) being structurally sound; (2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <p>We seek that point 4 for council discretion is removed. <del>“the duration of the discharge permit to be issued, in order to implement the outcomes of any Freshwater Management Unit Process to be undertaken in accordance with Policy 1;”</del></p>
54.12	Bayswater Dairy Ltd	Rule 35	Oppose	Amend the limit to one feed lot or wintering pad per 100ha. Change “Chartered Professional Engineer” to suitably qualified person. Is it necessary to test effluent ponds if they have been suitably designed and built by a suitably qualified person? Change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.
62.12	Beef + Lamb NZ	Rule 35	Support in part Amend	<p>Amend rule to read:</p> <p>(3) directly from feed lots and wintering pads that:</p> <p>(a) until 31 December 2017 service no more than 100 adult cattle or 250 adult deer; and</p> <p>(b) from 1 January 2018 service no more than 100 adult cattle or 250 adult deer where the feed lot or wintering pad:</p> <p>(i) is not less than 20 metres from the nearest sub-surface (tile) drain, surface waterbody or wetland; and</p> <p><del>(ii) is the only feed lot or wintering pad on the landholding; or</del></p> <p>(c) service no more than 10 adult cattle or 25 adult deer in any other circumstance; or</p>
64.17	BELGARD Family Trust (GA & JM Rauber)	Rule 35	Oppose Amend	Each system should be accessed on its own merits not a number. Two or three well run pads will have less of an effect than one large one.
76.1	BLACKMORE Peter	Rule 35	Oppose	No minimum storage capacity rule e.g. storage includes stone traps, should not require drop test. Drop tests should only be required if storage is over 20,000 litres.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
77.2	BLACKMORE Richard Thomas	Rule 35	Oppose	Structure of 20,000 litres.
78.2	BLACKMORE Warren	Rule 35	Oppose	Drop tests should only be required if storage is over 20,000 litres.
79.5	BLAIR Phillipa Mary	Rule 35	Amend	As many feed pads as needed under 100 cattle.
82.7	BLOMFIELD M J & K G Trust	Rule 35	Oppose	Oppose one feed lot or feed pad per landholding. We think more may be permitted without consent with an appropriate Management Plan (Appendix N) and change wording to a “suitably qualified person”.
89.33	BRENTLEIGH Family Trust	Rule 35	Oppose	Remove “Landholding” from the plan and replace with “Title”.
92.12	Bristol Grove Dairies	Rule 35(b)(iii)	Amend	Impractical to use a Chartered Professional Engineer and certification from an engineer should suffice. Amend Rule 35(b)(iii)(2) as the drop test is impractical. Observation portals into tiles on the outside of the pond should allow ability to see if pond is leaking as per current rule.
94.5	Brooklea Farm Ltd	Rule 35	Oppose Support	Support that ES allow farmers the option to have more than one feedlot.
96.3	BROWNING Stuart	Rule 35	Neutral	Alter to using Stock Units with a table detailing the values for each age group of each farmed species. Add clarity for landholdings which have more than one feed lot or wintering pad.
99.5	BUCKINGHAM Greta	Rule 35	Amend	A sensible option here would be as many pads as you like provided all other rules are met and the total number of cattle on feed pads does not exceed 100.
101.5	BUCKINGHAM Thomas	Rule 35	Amend	A sensible option here would be as many pads as you like provided all other rules are met and the total number of cattle on feed pads does not exceed 100.
102.6	Burwood Station Ltd	Rule 35	Oppose	Amend the need for a chartered professional engineer as these are unnecessary and amend for more activities to be permitted without consent with an appropriate Management plan (Appendix N). Change wording to a “suitably qualified person”.
108.84	BYTHELL Jesse	Rule 35(a)(iv)	Support	I support Rule 35 but ask that ‘or naturally occurring wetlands’ be added to 35 (a)(iv).
114.5	CALLAHAN Pamela	Rule 35	Oppose	Having only one or two feed pads is ridiculous.
121.3	CARTER W J	Rule 35	Oppose	I believe you should not be limited on feed pads. Change wording to ‘a suitably qualified person’.
129.2	CHRISTEY Anthony	Rule 35		Clarify wording “per landholding”.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
133.7	Civil Tech Ltd	Rule 35(b)(iii)	Amend	Continue with existing list of SQP's and with all future SQP's Environment Southland can decide on their suitability on a case by case basis.
137.3	CLARKE B D & H J Partnership (Brendon Clarke)	Rule 35 (a)(i)(3)(b)(ii)	Oppose Amend	Allow for the use of more than one woodchip/sawdust pad (under 100 cows per pad), possibly one pad per 40ha farm size, as a permitted activity.
138.3	CLARKE B D & H J Partnership (Hayley Clarke)	Rule 35 (a)(i)(3)(b)(ii)	Oppose Amend	Allow for the use of more than one woodchip/sawdust pad (under 100 cows per pad), possibly one pad per 40ha farm size without the requirement or consent as a permitted activity.
141.5	CLARKE Julie Ann & TUCK Roger	Rule 35	Amend	Allow the use of calving/standoff pads (under 100 cows per pad) on farms to help maintain good soil structures in wet weather, without the requirement or consent as a permitted activity provided Good Management Practices are followed.
148.5	CLEMENT Paul & Linda	Rule 35(b)(iii)	Oppose Amend	A pond level drop test may be necessary for older effluent ponds but those with the inspection chamber should not be required to have one.
152.18	Clover Bell Ltd	Rule 35(a)	Support Amend	We would like consideration given to changing the wording of part (a)(1)(3)(b)(6) to allow discharge up to, say 20 metres, of a sealed water abstraction point.
155.7	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 35(a)(i)(3)(b)i	Support in part Amend	A limit on the number of stock which could use feed pads on a property without requiring a consent.
163.5	CONLAN Eddie & Judy Family Trust	Rule 35(b)(iii)	Amend	Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement. The clause to include a reference to size so that only larger structures need certified and require a drop test.
168.4	COPLAND R D & N J Family Trust	Rule 35(b)(iii)	Amend	Any pond, tank or structure greater than 10m <sup>3</sup> would be more appropriate.
189.38	Dairy Holdings Ltd	Rule 35		Amend Rule 35(a)(xii): the location of any <u>new or upgraded</u> sub-surface drains within the discharge area, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.  Amend Rule 35(b)(i): the discharge is the replacement of a lawfully established discharge ( <u>which includes consented discharges that have not yet been exercised</u> ) pursuant to Sections 124-124C of the RMA

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Amend Rule 35(b)(iii): any pond, tank or structure used to store agricultural effluent prior to discharge is certified by a <del>Chartered Professional Engineer</del> <u>suitably qualified person</u> as:...</p> <p>Amend Rule 35(c) as follows: The discharge of agricultural effluent or water containing agricultural effluent onto or into land, in circumstances where contaminants may enter water that did not exist (<u>but not including discharges that had consent but were yet to be implemented</u>) as at 1 May 2016 or seeks to increase the number of stock provided for in the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite-Marine Terraces physiographic zones that does not meet one or more conditions of Rule 35(a) is a discretionary activity, provided the following conditions are met:...</p>
190.16	DairyNZ	Rule 35(a)(i)(3)	Support Amend	<p>Amend to: (3) directly from feed lots and wintering pads that: (a) Until 31 December 2017 service no more than 100 adult cattle or 250 adult deer (b) From 1 January 2018 service no more than 100 adult cattle or 250 adult deer where the feed lot or wintering pad: (i) Is not less than 20 metres from the nearest sub-surface (tile) drain, surface waterbody or wetland; and <del>(ii) Is the only feed lot or wintering pad on the landholding; or</del> (iii) Service no more than 10 adult cattle or 25 adult deer in any other circumstance</p>
190.17	DairyNZ	Rule 35	Support Amend	<p>Amend Rule 35(a)(vii) to: (vii) provided the soil moisture does not exceed field capacity the <del>maximum</del> <u>average</u> discharge depth of agricultural effluent or water containing agricultural effluent is 10 millimetres for each individual application.</p> <p>Amend Rule 35(b)(iii) to: (b)(iii) any pond, tank or structure used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: 1) Being structurally sound <u>at the time of inspection</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Amend matters of discretion in Rule 35(b)2 as follows:</p> <p>2. the separation distance (beyond that required under conditions (i), (ii) and (iii) above) of the discharge from surface waterbodies, artificial watercourses, <del>subsurface drains</del>, the coastal marine area, residential dwellings, places of assembly, urban areas, landholding boundaries, water abstraction points and registered drinking water supplies.</p> <p>Amend Rule 35(b)3 to:</p> <p>3. “other measures to avoid, remedy or mitigate adverse effects (including cumulative effects directly related to the discharge of dairy farm effluent) on water quality taking into account the nature and sensitivity of the receiving environment <del>, including the physiographic zone that the discharge is located in</del>”.</p> <p>And delete Matter of discretion (b) 4.</p>
192.13	DALE P T & S B Trust	Rule 35	Amend	<p>Don't ostracize Old Mataura to the detriment of those farming business in these zones. Work with farmers and industry figures such as Dairy NZ &amp; Fed Farmers to find practical solutions and outcomes for this zone. Consider allowing 10 year consents to continue.</p> <p>Expressly exclude this as a consented activity.</p>
198.5	DIACK Hugh	Rule 35	Oppose	Delete the following: Rule 35(3)(a), Rule 35(3)(b), Rule 35(3)(b)(i), Rule 35(3)(b)(ii), and Rule 35(3)(c).
202.3	DICKSON Brent Gordon	Rule 35(b)(iii)	Amend	<ol style="list-style-type: none"> <li>1. Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement.</li> <li>2. The clause to include a reference to size so that only larger structures need certified (suggest over 10,000 litres) and require a drop test.</li> <li>3. Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement.</li> <li>4. The clause to include a reference to size so that only larger structures need certified (suggest over 10,000 litres) and require a drop test.</li> </ol>
203.3	DICKSON Bruce John	Rule 35 b(iii)	Amend	<ol style="list-style-type: none"> <li>1. Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement.</li> <li>2. The clause to include a reference to size so that only larger structures need certified (suggest over 10,000 litres) and require a drop test.</li> <li>3. Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement.</li> <li>4. The clause to include a reference to size so that only larger structures need certified</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought												
				(suggest over 10,000 litres) and require a drop test.												
205.29	Dillon Ag Ltd (Chris Dillon)	Rule 35	Oppose	Remove the word “Landholding” from the plan and replace with “Title”.												
206.29	Dillon Ag Ltd (Rochelle Dillon)	Rule 35	Oppose	Remove the word “Landholding” from the plan and replace with “Title”.												
208.3	DILLON M J & S E	Rule 35	Oppose	Increase the number of cows per wintering pad and make the number of pads unlimited so the stock numbers can be kept low. Remove rule 35(3)(b)(ii).												
208.4	DILLON M J & S E	Rule 35	Oppose													
209.34	DIPROSE Dave	Rule 35	Support	<p>The location of any ( <u>known</u>) sub-surface drains within the discharge area, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.</p> <p>(iii)any pond, tank or structure used to store agricultural effluent prior to discharge is certified by a <del>Chartered</del> Professional Engineer as:</p> <p>(1)being structurally sound;</p> <p>(2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <table border="1"> <thead> <tr> <th>Maximum Depth of Pond (m) excluding freeboard</th> <th>Maximum Allowable Pond Level Drop (mm per 24 hours)</th> </tr> </thead> <tbody> <tr> <td>,&lt;0.5</td> <td>1.2</td> </tr> <tr> <td>0.5 to 1.0</td> <td>1.4</td> </tr> <tr> <td>1.0 to 1.5</td> <td>1.6</td> </tr> <tr> <td>1.5 to 2.0</td> <td>1.8</td> </tr> <tr> <td>&gt;2.0</td> <td>2.0</td> </tr> </tbody> </table>	Maximum Depth of Pond (m) excluding freeboard	Maximum Allowable Pond Level Drop (mm per 24 hours)	,<0.5	1.2	0.5 to 1.0	1.4	1.0 to 1.5	1.6	1.5 to 2.0	1.8	>2.0	2.0
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217.3	DRISCOLL Timothy & Jocelyn	Rule 35 (a)(i)(3)(b)(ii)	Oppose	Changes I would like to see are: multiple stand areas are permissible for purposes of reducing pasture damage and no more than 100 cows on each area.												

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
218.3	Drumderg Farm & Melgan Ltd	Rule 35		Come spring we spread the old silage and effluent on paddocks in the process of tidying up the rock pads for next year's silage. This needs to be a permitted activity.
220.16	Drylands Farming Ltd	Rule 35	Oppose Amend	Rule 35 needs amended to allow '1 wintering, stand off or feed pad, containing less than 100 head of cattle, per title of landholding' as this is possible through the sale of a title to another individual anyway.
221.16	DRYSDALE Family Trust	Rule 35	Oppose Amend	Rule 35 needs amended to allow '1 wintering, stand off or feed pad, containing less than 100 head of cattle, per title of landholding' as this is possible through the sale of a title to another individual anyway.
233.12	DYSON Valerie &Glyn	Rule 35	Amend	Rule 35 (c) should have the same matters that ES restricts discretion over as rule 35(b).
245.5	Enfield Ltd	Rule 35(a)(i)(1)	Amend	A dairy shed servicing a maximum of 50 cows that is not supplying a dairy company or 100 of any other animals. Make this a permitted activity.
247.12	Environment Southland	Rule 35	Amend	Amend the reference from Policy 1 to Policy 47.
248.3	Erne Hill Ltd	Rule 35	Amend	Rule 35(3)(ii). For the spring calving period we would like calving lots of a maximum of 60 cows a reasonable distance apart so long as no more than 30% of the herd are on calving lots at one time.
259.13	F D Enterprises Ltd	Rule 35	Oppose in part	No changes to 35(1)(i)(4) are sought. Rule 35(b)(iii) any pond, <u>or</u> tank or <del>structure</del> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: (1) being structurally sound; (2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.
264.10	FarmRight Ltd	Rule 35	Oppose in part	Amend Rule 35(b)(iii): any pond, <u>or</u> tank or <del>structure</del> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: (1) being structurally sound; (2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.
265.93	Federated Farmers of NZ (Southland Province)	Rule 35	Oppose in part	Amend rule as follows: (a) The discharge of agricultural effluent or water containing agricultural effluent onto or into land, in circumstances where contaminants may enter water, is a permitted activity, provided the following conditions are met: (i) the discharge is from; (1) a dairy shed servicing a maximum of 20 cows or 100 of any other animal; or (2) piggeries with a maximum of 70 x 50 kg pig equivalents; or (3) directly from feed lots and wintering pads that:



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(a) <del>until 31 December 2017 service no more than 100 adult cattle or 250 adult deer; and;</del>  <del>(b) from 1 January 2018 service no more than 100 adult cattle or 250 adult deer where the feed lot or wintering pad:</del></p> <p>(i) is not less than 20 metres from the nearest sub-surface (tile) drain, surface waterbody or wetland; <del>and or</del>  <del>(ii) is the only feed lot or wintering pad on the landholding; or</del></p> <p>(c) service no more than 10 adult cattle or 25 adult deer in any other circumstance; or</p> <p>(4) stock underpasses; or</p> <p>(5) holding tanks on stock trucks;</p> <p>(ii) there is no discharge of agricultural effluent or water containing agricultural effluent to any surface watercourse, either directly or by overland flow, run-off, or via a pipe;</p> <p>(iii) there is no overland flow or ponding of effluent, or application to land when the soil moisture exceeds field capacity;</p> <p>(iv) the discharge is not within 20 metres of any surface waterbody, artificial watercourse, wetlands listed in Appendix A or the coastal marine area;</p> <p>(v) the discharge is not within 200 metres of any place of assembly or dwelling not on the same landholding, or 20 metres of the boundary of any other landholding;</p> <p>(vi) the discharge is not within 100 metres of any water abstraction point;</p> <p>(vii) provided the soil moisture does not exceed field capacity, the <del>maximum</del> average discharge depth of agricultural effluent or water containing agricultural effluent is 10 millimetres for each individual application;</p> <p>(viii) the maximum loading rate of nitrogen onto any land area does not exceed 150 kilograms of nitrogen per hectare per year from agricultural effluent or water containing agricultural effluent;</p> <p>(ix) the discharge system is operated and maintained so that there is no spray drift or offensive or objectionable odour beyond the landholding boundary; and</p> <p><del>(x) the minimum return period for discharging agricultural effluent or water containing agricultural effluent onto or into the site is 28 days; and</del></p> <p>(xi) the discharge does not occur within the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then 250 metres of the abstraction point of a drinking water supply site identified in Appendix J; and</p> <p>(xii) the location of any sub-surface drains within the discharge area, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought												
				<p>(b) The discharge of agricultural effluent or water containing agricultural effluent onto or into land, in circumstances where contaminants may enter water, is a restricted discretionary activity, provided the following conditions are met:</p> <p>(i) the discharge is the replacement of a lawfully established discharge pursuant to Sections 124-124C of the RMA,</p> <p>(ii) the existing discharge consent for agricultural effluent specifies a maximum number of animals from which the effluent is collected, and that number is not increasing; and</p> <p>(iii) any pond, tank or structure used to store agricultural effluent prior to discharge is certified by a <del>Chartered Professional Engineer</del> <u>suitably qualified person</u> as:</p> <p>(1) being structurally sound <u>at the time of inspection</u>;</p> <p>(2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <table border="1" data-bbox="1055 683 1787 1121"> <thead> <tr> <th data-bbox="1055 683 1429 826">Maximum Depth of Pond (m) excluding freeboard</th> <th data-bbox="1429 683 1787 826">Maximum Allowable Pond Level Drop (mm per 24 hours)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 826 1429 882">&lt;0.5</td> <td data-bbox="1429 826 1787 882">1.2</td> </tr> <tr> <td data-bbox="1055 882 1429 938">0.5 to 1.0</td> <td data-bbox="1429 882 1787 938">1.4</td> </tr> <tr> <td data-bbox="1055 938 1429 994">1.0 to 1.5</td> <td data-bbox="1429 938 1787 994">1.6</td> </tr> <tr> <td data-bbox="1055 994 1429 1050">1.5 to 2.0</td> <td data-bbox="1429 994 1787 1050">1.8</td> </tr> <tr> <td data-bbox="1055 1050 1429 1121">&gt;2.0</td> <td data-bbox="1429 1050 1787 1121">2.0</td> </tr> </tbody> </table> <p>Environment Southland will restrict the exercise of its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. application depth and/or rate, storage requirements, nutrient loading (in particular nitrogen) and size of the disposal area, timing, and contingency plans;</li> <li>2. the separation distance (beyond that required under conditions (i), (ii) and (iii) above) of the discharge from surface waterbodies, artificial watercourses, <del>subsurface drains</del>, the coastal marine area, residential dwellings, places of assembly, urban areas, landholding boundaries, water abstraction points and registered drinking-water supplies;</li> <li>3. other measures to avoid, remedy or mitigate adverse effects (including cumulative effects directly related to the discharge of farm dairy effluent) on water quality taking into account the nature and sensitivity of the receiving environment, <del>including the physiographic zone that the discharge is located in;</del></li> </ol>	Maximum Depth of Pond (m) excluding freeboard	Maximum Allowable Pond Level Drop (mm per 24 hours)	<0.5	1.2	0.5 to 1.0	1.4	1.0 to 1.5	1.6	1.5 to 2.0	1.8	>2.0	2.0
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>4. the duration of the discharge permit to be issued, in order to implement the outcomes of any Freshwater Management Unit Process to be undertaken in accordance with Policy 1;</p> <p>5. the adequacy of information provided to demonstrate that any pond, tank or structure used to store agricultural effluent prior to discharge does not leak; and</p> <p>6. the structural integrity of any pond, tank or structure used to store agricultural effluent prior to it being discharged.</p> <p>(c) The discharge of agricultural effluent or water containing agricultural effluent onto or into land, in circumstances where contaminants may enter water that did not exist as at 1 May 2016 or seeks to increase the number of stock provided for in <del>the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or Lignite Marine Terraces physiographic zones that does not meet one or more conditions of Rule 35(a)</del> is a discretionary activity, provided the following conditions are met:</p> <p>(i) the discharge is not within 20 metres of any surface waterbody, artificial watercourse or the coastal marine area;</p> <p>(ii) the discharge is not within 200 metres of any place of assembly or dwelling not on the same landholding, or 20 metres of the boundary of any other landholding;</p> <p>(iii) the discharge is not within 100 metres of any water abstraction point.</p> <p>(d) The discharge of agricultural effluent or water containing agricultural effluent to land, in circumstances where contaminants may enter water, that does not comply with Rule 35(b) or Rule 35(c) is a non-complying activity.</p> <p>(e) Despite any other rule, the discharge of untreated agricultural effluent into surface or groundwater is a prohibited activity.</p>
270.3	Firdale Farms Ltd	Rule 35 (a)(i)(3)(b)(ii) & (a)(i)(3)(c)	Oppose	Amend Rule 35 so that farmers can have more than one standoff/calving pad, with less than 100 cattle per pad, per farm, as a permitted activity, providing good management practices are met.
277.50	Fonterra Co-operative Group Ltd	Rule 35	Oppose in part	<p>Amend Rule 35 to provide for discharges from wintering pads and feed lots post 1 January 2018 as restricted discretionary activities where they would otherwise be permitted except for non compliance with 35 (a)(i)(3)(b)(ii).</p> <p>Amend part (b)(iii) to exclude storage mechanisms of less than 20,000L e.g. small sumps in the dairy shed and small stone traps.</p> <p>Include provision in Rule 35 for discharges of agricultural effluent to be considered as discretionary activities when condition (b) (iii) (2) is not complied with.</p>
279.81	Forest & Bird NZ	Rule 35	Support with	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			amendments	rules.
281.3	Four Legged Farming Ltd	Rule 35(b)(iii)	Amend	<ol style="list-style-type: none"> <li>1. Amend (b)(iii) to include a reference to size so that only larger effluent storage structures need certified and requires a drop test. Suggest structures that hold greater than say 10m<sup>3</sup> are required to be certified.</li> <li>2. Above ground tanks should also be exempt.</li> <li>3. Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement.</li> </ol>
298.7	GARDYNE Joanne	Rule 35(b)(iii)	Oppose	Change certification to that of any 'suitably qualified' person as per old plan.
299.18	GARDYNE John	Rule 35	Oppose	SQP replaces chartered professional engineer.
300.18	GARDYNE Jonathan	Rule 35	Support	Retain.
301.4	GARDYNE Lois	Rule 35(b)(iii)	Oppose	Certification can be by any 'suitably qualified person' as in previous plan.
319.16	Glendhu Dairies Ltd	Rule 35	Oppose	Delete Rule 35(a)(i)(3)(b)(ii).
324.3	Glentui Farms Ltd	Rule 35(iii)	Oppose	Change the need for a chartered professional engineer to a "suitably qualified person".
333.4	Greenbush Farms Ltd	Rule 35(b)(ii)	Oppose	No restrictions on number of feedlots or wintering pads on a landholding.
339.12	GUNN Olivia	Rule 35	Oppose	<p>We recommend that the limit per changed to one feed lot or wintering pad per 100ha.</p> <p>We recommend the change to "Chartered Professional Engineer" to suitably qualified person. We question whether it is necessary to test effluent ponds if they have been suitably designed and built by a suitably qualified person?</p> <p>We recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.</p>
346.1	HALL K W & D J	Rule 35(3)(a)(ii)	Amend	I would like ES to remove the 100 cow limit and perhaps put a few rules in place to capture the nutrients or drainage from calving pads.
347.2	HAMILL Mark & Deborah	Rule 35(a)(x)	Amend	This does not allow for effluent systems with very low application rates. Needs to be a mm rate per day to allow for such systems.
348.7	HAMILTON Blair	Rule 35	Amend	Who pays when an existing investment is within 20 metres of a tile drain and is unable to be diverted? Allow an exemption for existing structures.
351.4	HAMILTON Rosemary	Rule 35		Rule 35(a)(i)(3)(b)(xii): It will be impossible to locate all sub surface drains within the discharge areas and maybe even some of the outlets as land has changed ownership and records not necessarily passed on. However, mapping, GPS coordinating and recording the depths of new and amended drainage should be recorded.

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				Rule 35(b)(iii)(2): The drop levels of ponds will be extremely difficult as the requirements to leave the pond half full and take measurements during winter means the pond is too full to contain the effluent should the spring be unfavourably wet.
361.13	HBG AgriLimited	Rule 35	Oppose	Amend the limit to one unconsented feed lot or wintering pad per 100ha as a more equitable way of restricting the number of these. Replace the term “Chartered Professional Engineer” with “suitably qualified person.” Only effluent ponds (and not other structures) should need to be tested.
362.9	Hedgehope Grazing Ltd	Rule 35	Oppose	Remove Rule 35(a)(i)(3)(b)(ii).  Delete discretion matter 4.  Amend Rule 35 (b) (iii) to allow for alternative tests.
365.7	HEENAN M D and D W	Rule 35	Oppose	Amend the rule to permit additional feed pads on larger properties over 200 hectares.
369.16	HENDERSON Michael	Rule 35	Oppose	Remove rule 35(3)(b)(ii).
375.4	Hillview Trust	Rule 35	Oppose in part	That the rule provides for one feedlot and one wintering pad as permitted and that the rule applies to each farm not each landholding.
380.2	HODSELL Sam	Rule 35	Amend	I don't think farmers should be limited to just one fed pad, the enforcement should be on making sure best practice is achieved.
381.22	HOLDER Wendy & Tom	Rule 35	Oppose	No specific decision requested.
386.11	Hopcroft Farms Ltd	Rule 35	Oppose	I recommend that the limit be changed to one feed lot or wintering pad per 100ha. This will much more fairly restrict the number of unconsented feed lots of wintering pads. I recommend the change to “Chartered Professional Engineer” to suitably qualified person. I question whether it is necessary to test effluent ponds if they have been suitably designed and built by a suitably qualified person? I recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.
387.17	HORRELL Andrew Russell	Rule 35	Amend	Remove clause (a) (i) (3) (b) (ii) “is the only feed lot or wintering pad on the land holding” from the plan.
396.3	Hughes-Crowley Company	Rule 35	Oppose	Changing the limit to one feed lot/wintering pad per 100ha.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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402.14	HUNT Alistair & Bernadette	Rule 35	Amend	Amend Rule to remove 35(a)(i)(3)(b)(ii).
408.3	Hynds Pipe Systems Ltd	Rule 35	Oppose	<p>(b)The discharge of agricultural effluent or water containing agricultural effluent onto or into land, in circumstances where contaminants may enter water, is a restricted discretionary activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) the discharge is the replacement of a lawfully established discharge pursuant to Sections 124-124C of the RMA,</li> <li>(ii) the existing discharge consent for agricultural effluent specifies a maximum number of animals from which the effluent is collected, and that number is not increasing;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>(iii) any pond, tank or structure <u>over 35m<sup>3</sup> in capacity</u> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer <u>including but not limited to certification through the territorial building consent process</u> as: <ul style="list-style-type: none"> <li>(1) being structurally sound;</li> <li>(2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</li> </ul> </li> </ul>
410.11	Invercargill Airport Ltd	Rule 35	Support	IAL does consider that the matters of discretion should ensure that adverse effects on the activities and operations of adjacent landholdings can be sufficiently considered.
420.4	JACK Wallace	Rule 35	Oppose	Amend requirement for maximum discharge each application, kilograms of nitrogen per ha per year, return period discharge and surface run off overland.
431.4	Kaikaha Farms Ltd	Rule 35	Oppose	Changing the limit to one feed lot/wintering pad per 100HA.
433.8	Kapuka Dairies Ltd	Rule 35	Oppose Amend	I propose that all existing feed lots or wintering pad be accepted as of today. There should not be the need to gain consent for existing feed lots or wintering pads. Any additional new proposed lots/pads on a landholding – this rule should apply. Remove certified engineers requirement. Retain Rule 35 (a) (viii) at no more than 150kg N per year.
451.10	Knockinnon Farm Trust	Rule 35	Oppose	Change Chartered Professional Engineer to suitably qualified person and change of wording, only effluent ponds to be tested.
461.5	LAMB Bruce & Gaye	Rule 35	Amend	Amend to allow as many pads as you like provided all other rules are met and the total number of cattle on feed pads does not exceed 100.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
464.20	Landpro Ltd	Rule 35	Support in part	<p>We propose the following amendments as listed below.</p> <p>Retain 35(1)(i)(4).</p> <p>35(a)(xii) “the location of any <u>known</u> sub-surface drains within the discharge area, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.”</p> <p>Rule 35(b)(iii) any pond, <u>or tank or structure</u> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: (1) being structurally sound; (2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <p>We seek that point 4 for council discretion is removed. <del>“the duration of the discharge permit to be issued, in order to implement the outcomes of any Freshwater Management Unit Process to be undertaken in accordance with Policy 1;”</del></p> <p>We propose the following: 5. “the adequacy of information provided to demonstrate that any pond, tank <del>or structure</del> used to store agricultural effluent prior to discharge does not leak;” and 6. “the structural integrity of any pond, tank <del>or structure</del> used to store agricultural effluent prior to it being discharged.”</p> <p>We seek the timing is amended to be consistent with the rest of the plan i.e. 30 May 2016.</p>
478.22	LOVERIDGE David	Rule 35	Oppose	Only effluent ponds should need to be tested prior to discharge. Not all structures that hold effluent such as weeping walls, stone traps etc.
482.16	Lower Aparima Catchment Group	Rule 35(a)(i)(3)(b)(ii)	Oppose	<p>Rule 35(a)(i)(3)(b)(ii)</p> <p>We recommend that the limit per changed to one feed lot or wintering pad per 100ha. We recommend the change to “Chartered Professional Engineer” to suitably qualified person. We recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.</p>
502.5	MARSHALL Allan & Kathryn	Rule 35	Amend	Amend to allow as many pads as you like provided all other rules are met and the total number of cattle on feed pads does not exceed 100.
507.5	MARSHALL Spencer	Rule 35	Amend	Amend to allow as many pads as you like provided all other rules are met and the total number of cattle on feed pads does not exceed 100.
509.5	Matai Farms Ltd	Rule 35	Oppose	Allow more than one feed lot per landholding provided they have a management plan and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				follow best practice.
510.16	Mataura Butcher Shop Ltd	Rule 35	Oppose	Make permitted.
518.11	MCDONALD Stuart & HALDER Robyn	Rule 35(b)(2)		Delete this subsection, as surely the individual farmer ought to be able to decide if he requires more than one feed pad on his farm.
520.6	MCELLIGOTT J W & T L	Rule 35	Oppose Amend	We believe that you should be able to discharge solids onto the land at any given time as long as the conditions are right. Allow for more than one feed pad per farm.
556.8	MCRAE Joe	Rule 35	Amend	Delete section A, 1, 3, b, ii.
557.7	MCRAE Matt	Rule 35	Amend	Delete section A, 1, 3, b, ii.
564.13	Mid-Aparima Catchment Group	Rule 35	Oppose	We recommend that the limit per changed to one feed lot or wintering pad per 100ha. This will much more fairly restrict the number of unconsented fed lots or wintering pads. We recommend the change to “chartered professional engineer” to suitably qualified person. We question whether it is necessary to test effluent ponds if they have been suitably designed and built by a suitably qualified person? We recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.
569.11	MILLER R J Trust	Rule 35	Oppose in part	We oppose that a chartered professional engineer should sign off on all agricultural effluent storage, the inclusion of the word structure within this rule will require a sump and stone trap to pass the same test as a pond or tank where the risk of failure is way less. We propose the removal of the word structure used to store agricultural effluent.
570.18	MILLER R L & S J Farm Trust	Rule 35	Oppose in part	Increase the distance to 700m. Add that the discharge cannot occur during windy conditions, especially if the prevailing wind is in the direction of a neighbouring dwelling.
583.23	MOSEBY Ryan	Rule 35(a)(i)(3)(b)(ii)	Amend	Push good management practice of such pads and remain as permitted activity status. Determine how regular the point of abstraction recorded in Appendix J is utilised, the application method/system in place and set buffer zone accordingly.
598.16	Newton Slink Skins	Rule 35	Oppose	Make permitted.
603.9	Nithdale Station	Rule 35		Include ‘known’ subsurface drains.
614.21	NZ Transport Agency	Rule 35	Oppose	...(5) holding tanks on stock trucks and <u>Stock Truck Effluent Disposal Sites</u> ;
621.3	Otara Dairies Ltd	Rule 35	Oppose	Remove restriction on number of feed lots or wintering pads on a landholding.
640.41	Pourakino Catchment Group	Rule 35	Oppose	..... (iii) any pond, tank or structure <u>over 35m<sup>3</sup> in capacity</u> used to store agricultural effluent prior



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				to discharge is.....
644.4	Premier Dairies Ltd	Rule 35	Oppose	<p>On ponds that are lined and on ponds that have leakage inspection points I really struggle to understand the need to go to this expense. It is like we are guilty until we prove ourselves to be innocent yet we have constructed our ponds to your specifications at huge initial costs. I am fully behind a clean green environment but you need to be practical in your expectations and use instruments that we already have in place to monitor these things.</p> <p>I would like the following questions answered:</p> <ol style="list-style-type: none"> <li>1. What and how many issues have been found to suggest that there is a need for this ruling?</li> <li>2. Why are you moving to chartered engineers only in this area when this has never been a stipulation in the past? This again is only going to increase our costs and have no benefit to what you are saying that you want to achieve.</li> </ol>
647.9	Progressive Engineering Southland Ltd	Rule 35	Oppose	<p>Rule 35(a)(vii): provided the soil moisture does not exceed field capacity, the <del>maximum</del> <u>average</u> discharge depth of agricultural effluent or water containing agricultural effluent is 10 millimetres for each individual application.</p> <p>Rule 35(b)(iii): any pond, tank or structure used to store agricultural effluent <u>greater than 35m<sup>3</sup> in capacity</u> prior to discharge is certified by a Chartered Professional Engineer as:</p> <p>(1) being structurally sound; <u>Or</u></p> <p>(2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p>
655.10	RABBIDGE Dean	Rule 35(a)(i)(3)(b)	Amend	Limiting a property to only one pad of up to 100 cattle, properties should be able to have more than one if only used for short periods of time when weather and soil conditions are unfavourable.
663.5	RDAgritech Ltd	Rule 35(b)(iii)	Amend	<p>Amend clause (b)(iii) of Rule 35, to exclude any storage that has been constructed in accordance with Rule 32 of the Southland Water and Land Plan and completed within the past three years.</p> <p>Amend Rule 35(b)(iii) to require that the Chartered Professional Engineer is a current “Council approved supplier of certification”. If required, add new Appendix covering certification requirements/assessment process.</p> <p>Amend Rule 35(b)(iii)(2) to state that any pond, (or storage) that is subject to infiltration or</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>otherwise experiences an increase in level that cannot be accounted for by direct rainfall, is considered as not meeting the relevant pond drop.</p> <p>Amend Rule 35(b)(iii)(2) of rule 35, to exempt concrete-lined components of the effluent conveyance system from <u>drop testing</u> provided that:</p> <ul style="list-style-type: none"> <li>(a) The structure has been completely emptied, cleaned and visually inspected, and</li> <li>(b) The structure has no <u>visible</u> cracks or defects that would allow effluent to leak from the structure, and</li> </ul> <p>A CPEng has certified that the scope of inspection carried out is appropriate.</p> <p>Amend Rule 35(b)(iii)(2) of rule 35, to exempt synthetically-lined structures from drop testing provided that:</p> <ul style="list-style-type: none"> <li>(a) the structure has a Geomembrane (synthetic) liner that complies with IPENZ Practice Note 21-Part 3, and</li> <li>(b) the structure has subsoil drainage and leak detention system in place, and</li> <li>(c) a CPEng has certified that the leak detection system will provide adequate leak detection, and</li> </ul> <p>substantive evidence, reviewed by CPEng, that there is no effluent entering the leak detection system is provided to council.</p>
666.20	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 35	Amend	This needs rewritten to be more practical.
668.7	Riverfield Farms Ltd	Rule 35	Oppose	<p>Rule 35(a)(i)(3)(b)(ii): We think more feed lots or wintering pads may be permitted without consent with an appropriate Management plan (Appendix N).</p> <p>Change wording of Rule 35(b)(ii) to “a suitably qualified person”.</p>
672.6	ROBERTSON Antony	Rule 35	Amend	Allow more than one 99 cow feed pad per farm.
676.4	ROBINSON Brent	Rule 35	Amend	Amend to be measured on a stocking rate basis per hectare, rather than just the number of animals.
678.6	ROBINSON Jeffrey	Rule 35	Oppose	Delete the following: Rule 35(3)(a), Rule 35(3)(b), Rule 35(3)(b)(i), Rule 35(3)(b)(ii), and Rule 35(3)(c).
679.6	ROBINSON Michael	Rule 35	Oppose	Delete the following: Rule 35(3)(a), Rule 35(3)(b), Rule 35(3)(b)(i), Rule 35(3)(b)(ii), and Rule 35(3)(c).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
685.3	Rosebrae Farm Ltd	Rule 35	Amend	Rule 35(a)(i)(3)(b): Allow the use of a number of calving standoff pads under 100 cows per pad provided good management practices are followed.
687.2	Roseneath Dairies	Rule 35(b)(iii)	Amend	Rule 35(b)(iii) Ponds with a liner and leak detection drains installed to be exempt from the drop test requirement. Amend the clause to include a reference to size so that only larger structures need certified and require a drop test.
697.7	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 35	Support	Retain.
711.11	SCOTT G D & M M	Rule 35(a)(i)	Amend	If good management practices continue there should be no reason to limit on landholding to only one feedlot or wintering pad.
712.32	Seaview Trust & Oraka Farms Ltd	Rule 35		Recommend referring back to previous plan guidelines.
716.5	SHALLARD Mark & Tania	Rule 35	Oppose Amend	As an alternative I propose <ul style="list-style-type: none"> <li>existing feedlots be excluded from limits.</li> <li>sheep feedlots be excluded from limits.</li> </ul>
730.9	SMALLEY Timothy	Rule 35	Oppose	Oppose due to perceived inaccuracy and volatility of the test.
737.24	Smithill Ltd	Rule 35	Oppose	(b), (iii), (2.) - We specifically oppose this section. The effluent pond drop test is an unworkable test due to climatic conditions, and specific test requirements are not reasonably practicable. Why is drop testing being mentioned in Rule 35, instead of Rule 32? The drop test is only relevant when effluent is being stored so how is this relevant for the discharge of effluent to land.
740.5	South Coast Dairy Ltd	Rule 35 (3)(b)(ii)	Oppose	That there be no restriction on the number of feedlots or wintering pads on a farm that is wintering their own stock.
741.3	South Hughes Farms Ltd	Rule 35	Oppose	Changing the limit to one feed lot/wintering pad per 100ha.
752.128	Southland Fish & Game Council	Rule 35	Support	Retain. BUT Amend all references that refer to distances from any surface waterbody to provide: “. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . .”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
759.15	Springlands Group Ltd	Rule 35	Support	<p>Retain Rule 35(a)(i)(4).</p> <p>Rule 35(a)(xii) “the location of any <u>known</u> sub-surface drains within the discharge area, and their outlet position and relative depth, is mapped and provided to Environment Southland upon request.”</p> <p>Rule 35(b)(iii) any pond, <u>or</u> tank or <del>structure</del> used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer as: (1) being structurally sound; (2) meeting the relevant pond drop level outlined below, when tested in accordance with the methodology in Appendix P.</p> <p>We seek that point 4 for council discretion is removed. <del>“the duration of the discharge permit to be issued, in order to implement the outcomes of any Freshwater Management Unit Process to be undertaken in accordance with Policy 1;”</del></p> <p>We propose the following: 5. “the adequacy of information provided to demonstrate that any pond, tank <del>or structure</del> used to store agricultural effluent prior to discharge does not leak;” and 6. “the structural integrity of any pond, tank <del>or structure</del> used to store agricultural effluent prior to it being discharged.”</p> <p>We seek the addition of Old Mataura Zone in Rule 35(c) and that the timing is amended to be consistent with the rest of the plan i.e. 30 May 2016.</p>
761.13	STALKER Hanna & Callum	Rule 35	Oppose	<p>Change from ‘Chartered Professional Engineer’ to suitably qualified person.</p> <p>Remove requirement to test effluent ponds if they have been suitably designed and built by a suitably qualified person?</p> <p>Change wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.</p> <p>Change the limit to one feed lot or wintering pad per 100ha. This will much more fairly restrict the number of unconsented feed lots or wintering pads.</p>
765.4	Stenkoll Farms Ltd	Rule 35	Oppose	<p>Changing the limit to one feed lot/wintering pad per 100HA.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
766.9	STEVENS Brendon	Rule 35(a)(ii)	Amend	Amend Rule 35(a)(xii) to read “the location of any <u>known</u> sub-surface drains within...”.
777.9	STRATFORD Chris & Lynsey	Rule 35	Oppose	<p>Limit mapping of drains to known, new, or maintained existing drains.</p> <p>Phase in the requirement re Chartered Professional Engineer sign off-to permit sufficient people to get qualified.</p> <p>Think about the drop test. Will it be practical? What will the cost be? What is the real benefit of this test? Does it encourage poor management practice leading into winter?</p> <p>Remove the limit on feed pads, feed lots and wintering pads. If this is unacceptable, could effluent disposal from multiple calving pads/wintering barns be a permitted activity if the structure existed before 31 May 2016?</p> <p>Clarify what ancillary structures must be drop tested and which are excluded (we suggest stone traps, sludge beds, weeping walls etc.).</p> <p>Include a process whereby effluent discharge consents which are due for renewal and may be granted for a limited period pending the outcome of the FMU process can automatically roll over on the same conditions until the outcomes are known and the consent renewal can be dealt with once with all the information on the table. Make sure the costs associated with the roll over are reasonable.</p>
797.46	Nga Runanga and TRONT	Rule 35	Oppose in part	<p>Amend Rule 35(a)(viii) to reflect the approach taken in the physiographic zones so that the permitted rate of nitrogen onto any land area from agricultural effluent or water containing agricultural effluent does not exceed the capacity of a specific physiographic zone to accommodate the nitrogen loss.</p> <p>Add new clause to Rule 35(a):</p> <p><u>A Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming activity being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p>
798.8	TEMPLETON Luke	Rule 35	Oppose	I recommend that the limit per changed to one feed lot or wintering pad per 100ha.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				I recommend the change to “Chartered Professional Engineer” to suitably qualified person.  I recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.
801.5	Terrace Farm Trust & Johnrey Trust		Oppose	Allow flexibility in Rule 35(a)(1)(b)(ii) to stand off cows.  Rule 35(b)(iii)(2): A drop test should not be required for all systems, above ground tanks should be omitted from this rule.
802.28	The 254 Partnership & Gerken Family Trust	Rule 35	Oppose	The wording of “contaminants <u>may</u> enter water’ is ambiguous. Change wording to “contaminants directly enter water way or body”. The limit of 20 cows is ambiguous as implies milking those cows for a full lactation. This limit needs to be measured by a formula including milking time (number of cows/average time to milk/number of milking clusters and amended to an annualised figure. (i.e. 20 cows annually is the equivalent of X cows for 3 months, Y cows for 4 months and so on). A 3ibii There is only one feed pad permitted per Landholding. Again this severely disadvantages larger operators. Remove the word “Landholding” from the plan and replace with “Title”.
810.40	Three Rivers Catchment Group (TRCG)	Rule 35(b)	Oppose	... (iii) any pond, tank or structure <u>over 35m<sup>3</sup> in capacity</u> used to store agricultural effluent prior to discharge is ...
816.7	TIPPETT Christie	Rule 35	Oppose	Delete the following: Rule 35(3)(a), Rule 35(3)(b), Rule 35(3)(b)(i), Rule 35(3)(b)(ii) and Rule 35(3)(c).
820.11	TOPHAM Jeanette	Rule 35	Oppose	Remove the drop test requirement (b)(iii).
823.2	TROTTER Bruce & VAN ROSSUM Winy	Rule 35 (3)(b)(ii)	Oppose	No restrictions on the number of feedlots or wintering pads on a farm as per legal description.
827.7	TURNER Paul & Kayleen	Rule 35	Oppose	We think more feed lots or pads should be permitted without consent with an appropriate management plan (Appendix N). Change wording from ‘chartered professional engineer’ to a ‘suitably qualified person’.
828.6	Twin Farm Ltd	Rule 35	Oppose	Increase the number of cows per wintering pad and make the number of pads unlimited so the stock numbers can be kept low  Remove rule 35 (3)(b)(ii)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
830.6	Upper Aparima Catchment Group	Rule 35	Oppose	We think more may be permitted without consent with an appropriate Management Plan (Appendix N). Change wording to “a suitably qualified person.
832.95	VAN GOOL Raewyn	Rule 35	Support in part	<p>Retain Rule 35(a) to 35(a)(3)(i).</p> <p>More consideration needs to be given to Rule 35(a)(3)(ii) as this wil have a significant impact on farmers that use more than one self-feed silage stack as part of their feeding regime.</p> <p>Retain Rule 35(b)(i) &amp;(b)(ii).</p> <p>There is no timeframe in Rule 35(b)(iii) (1) and the most obvious one would be at the time of consent renewal for existing consents.</p> <p>Rule 35(b)(iii) (2): Option 1. Add “that where a pond has a Leak Detection System as referred to in IPENZ Practice Note 21 a pond drop test will not be required if an inspection of said LDS shows no leakage.</p> <p>Option 2. Delete.</p> <p>Retain Rule 35(c).</p> <p>Rule 35(d): Refer to comments on 35(b)(iii)(2).</p> <p>Clarity, Rule 35(e) does not contradict the previous clauses?</p>
833.7	VAN ROOIJEN Marcel	Rule 35	Oppose	We think more may be permitted without consent with an appropriate Management Plan (appendix N). Change wording to ‘a suitably qualified person’.
834.6	VAN ROSSUM Winy & Maarten	Rule 35	Oppose	<p>Rule 35 (b)(iii)</p> <p>Our recommendation is to use a suitably qualified civil engineering consultant as specified by the current Environment Southland list of suitably qualified people as opposed to a chartered professional engineer’.</p> <p>We recommend as an alternative to the drop test to check the existing inspection ‘holes’ of the effluent ponds that have these in place, and only to do the drop test on effluent ponds that do not have these inspection holes.</p>
857.7	West Range Farms Ltd (Derek Chamberlain)	Rule 35		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.
861.23	WHITE John Copeland	Rule 35	Oppose	<p>We recommend a change from “Chartered Professional Engineer” to suitably qualified person.</p> <p>Remove requirement to test effluent ponds if they have been suitably designed and built by a suitably qualified person?</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				We recommend a change of wording to state that only effluent ponds (not all structures that hold effluent) need to be tested.
864.8	Whyte Partnership	Rule 35	Amend	Number of feed lots used should depend on the size of the property i.e. one per 100ha or two per 200ha etc.
865.7	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 35	Amend	To remove the 'one only' ruling on feedlots/winter pads per land holding.
875.7	Willowbank Farms 2015 Ltd & Avondale Dairies	Rule 35	Oppose	We think more feed lots or wintering pads should be permitted without consent with an appropriate Management plan (appendix N) Change wording from Chartered Professional Engineer to 'a suitably qualified person.' Remove requirement for a chartered professional engineer to check all structures and tanks.
877.51	WILSON Aaron	Rule 35	Oppose in part	The use of these structures should be governed by an individual FMP. Rule 35(b)(iii) needs to define the term "structure". A local pond drop test standard needs to be developed and recognised as the most effective and efficient for use in Southland conditions.
880.55	WILSON Shannon	Rule 35	Oppose in part	The restriction of the number of feedlots or wintering pads removes a tool for environmental mitigation . The use of these structures should be governed by an individual FMP. A local pond drop test standard needs to be developed and recognised as the most effective and efficient for use in Southland conditions.

### Rule 36 – Horticulture wash-water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
79.6	BLAIR Phillipa Mary	Rule 36	Amend	Amend to allow ponding which allows water to slowly soak in, filtering contaminants.
99.6	BUCKINGHAM Greta	Rule 36	Amend	Delete Rule 36(b).
101.6	BUCKINGHAM Thomas	Rule 36	Amend	Amend to allow wash water to pond.
265.94	Federated Farmers of NZ (Southland Province)	Rule 36	Support	Retain.
279.82	Forest & Bird NZ	Rule 36	Support with	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			amendments	rules.
390.31	Horticulture NZ	Rule 36	Support in part	Amend Rule 36 to add options for management and add a new condition: Before (a) insert “ <u>Either</u> ” And After (d)(iv) insert: “ <u>OR meets the requirements of the COP for Horticulture Washwater (Horticulture NZ 2016).</u> ”
502.6	MARSHALL Allan & Kathryn	Rule 36	Amend	Allow ponding.
507.6	MARSHALL Spencer	Rule 36	Amend	Amend to allow ponding of wash water.
510.17	Mataura Butcher Shop Ltd	Rule 36	Oppose	Make permitted.
598.17	Newton Slink Skins	Rule 36	Oppose	Make permitted.
646.5	Progress Valley Farms Ltd	Rule 36	Amend	Delete Rule 36(b).
752.129	Southland Fish & Game Council	Rule 36(d)(i)	Support Amend	Amend Rule 36(d)(i) as follows: “(i) 20 metres of any <u>sub-surface drain, waterbody, including ephemeral or intermittently flowing streams, or wetland listed in Appendix A, excluding groundwater; or</u> ”  Insert new alphabetical bullet points as follows: “(f) <u>There is no overland flow or ponding of horticulture wash-water, or application onto land when soil moisture exceeds field capacity.</u> (g) <u>There is no discharge of horticulture wash-water directly to water, including groundwater or the coastal marine area.</u> ”
832.96	VAN GOOL Raewyn	Rule 36	Support	Retain.
877.52	WILSON Aaron	Rule 36	Support in part	The Water and Land plan should strongly encourage the formation of GMP guidelines from all rural industry good bodies and incorporate them into FMPs.
880.56	WILSON Shannon	Rule 36	Support in part	The W&L plan should strongly encourage the formation of GMP guidelines from all rural industry good bodies and incorporate them into FMPs.

## Rule 37 – Agricultural dips

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
20.4	ANDERSON Robert	Rule 37	Oppose	No specific decision requested
27.4	Arkley Farm Ltd	Rule 37	Support	Retain.
31.8	AYERS Warren	Rule 37	Amend	Delete.
40.10	BAKER David	Rule 37	Support	Retain.
47.17	Balfour, Wendonside & Waikaia Group	Rule 37	Support	Retain.
89.34	BRENTLEIGH Family Trust	Rule 37	Support	Retain.
91.5	Bridesdale Farming	Rule 37	Support	Retain.
109.4	C F L Farms Ltd	Rule 37	Oppose	Clarity needed regarding organic dips
198.6	DIACK Hugh	Rule 37	Support	Retain
205.30	Dillon Ag Ltd (Chris Dillon)	Rule 37	Support	Retain.
206.30	Dillon Ag Ltd (Rochelle Dillon)	Rule 37	Support	Retain.
233.13	DYSON Valerie &Glyn	Rule 37	Support	Retain.
258.14	Eyre Creek Ltd	Rule 37	Support	Retain.
265.95	Federated Farmers of NZ (Southland Province)	Rule 37	Support in part	Delete Rule 37(b).
279.83	Forest & Bird NZ	Rule 37	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
387.18	HORRELL Andrew Russell	Rule 37	Support	Retain.
402.15	HUNT Alistair & Bernadette	Rule 37	Support	Retain.
510.18	Mataura Butcher Shop Ltd	Rule 37	Oppose	Make permitted.
598.18	Newton Slink Skins	Rule 37	Oppose	Make permitted.
604.6	Nokomai Station Ltd	Rule 37	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
640.42	Pourakino Catchment Group	Rule 37	Support	Retain.
666.21	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 37	Support	Retain.
676.5	ROBINSON Brent	Rule 37	Support	Retain.
678.7	ROBINSON Jeffrey	Rule 37	Support	Retain.
679.7	ROBINSON Michael	Rule 37	Support	Retain.
681.15	Rockytommy Farming Ltd	Rule 37	Support	Retain.
682.11	Rokenwai Farming Ltd	Rule 37	Support	Retain.
697.8	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 37	Support	Retain.
711.12	SCOTT G D & M M	Rule 37	Support	Retain.
752.130	Southland Fish & Game Council	Rule 37	Support Amend	Retain Rule 37 as notified and amend Rule 37(c)(i) as follows: <p>“20 metres of any <u>sub-surface drain</u>, waterbody, <u>including ephemeral or intermittently flowing streams</u>, or wetland <del>listed in Appendix A</del>, excluding groundwater; or”</p> <p>Insert new alphabetical bullet point as follows:  “(g) <u>There is no overland flow or ponding of agricultural dips, or application onto land when soil moisture exceeds field capacity.</u>”</p>
759.16	Springlands Group Ltd	Rule 37	Support	Retain.
776.4	STRANG Matthew	Rule 37	Oppose	We oppose rule 37 it is probably quite common for sheep to be dipped in yards that are less than 250m from a well or bore - surely this can be permitted if the chemical used has a NIL withhold period??
792.28	TAYLER Matthew	Rule 37	Support	Retain.
802.29	The 254 Partnership & Gerken Family Trust	Rule 37	Support	Retain.
810.41	Three Rivers Catchment Group (TRCG)	Rule 37	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
816.8	TIPPETT Christie	Rule 37	Support	Retain.
832.97	VAN GOOL Raewyn	Rule 37	Support	Retain.
868.20	Wilkins Farming Ltd	Rule 37	Support	Retain.
869.7	WILKINS Pam	Rule 37	Support	Retain.

### Rule 38 - Animal and vegetative waste

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
3.7	A P & S M Verhaegh Ltd	Rule 38	Amend	Rule 38(d)(iv): Have a best practice during the 1 May to 30 September. The other 7 months available don't always have favourable conditions either.
7.6	AdBest Partnership	Rule 38		Remove discharge of sludge/solids being not permitted between 1 May to 30 September.
17.41	Alliance Group Ltd	Rule 38	Support	Retain.
18.1	Allison Dairies Ltd	Rule 38	Oppose	Make Rule 38(d)(iv) permitted.
24.99	Aratiatia Livestock Ltd	Rule 38	Support	Retain.
26.14	Ardoyne Farm Dairys	Rule 38	Support	Remove date restrictions and require adherence to GMP instead.
47.18	Balfour, Wendonside & Waikaia Group	Rule 38	Oppose in part	Delete.
54.13	Bayswater Dairy Ltd	Rule 38	Support Amend	Replace Section (d) (iv) with conditions based on soil temperatures or conditions as advised by the ES website.
64.18	BELGARD Family Trust (GA & JM Rauber)	Rule 38	Oppose Amend	Spread on a eaten off crop paddock in cold dry conditions will have less run off and contamination than spreading in October to April.. if it's wet.
76.2	BLACKMORE Peter	Rule 38	Oppose	Allow the spreading of materials during winter months when weather permits.
77.3	BLACKMORE Richard Thomas	Rule 38	Oppose	Leave same as current plan.
78.3	BLACKMORE Warren	Rule 38	Oppose	Allow the spreading of materials during winter months when weather permits.
92.13	Bristol Grove Dairies	Rule 38(d)(iv)		Effluent disposal should be according to soil moisture levels, not according to calendar dates. Example, the month of June 2016 has been much dryer than average and would have been

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				fine for effluent disposal.
94.6	Brooklea Farm Ltd	Rule 38	Oppose Support	Support changing dates from 30 September to 30 August.
96.2	BROWNING Stuart	Rule 38	Oppose	Restrict discharging waste when the ground is at field capacity and soil temperatures are below 5 degrees. This will have the effect of restricting application of waste when grass is or near dormant and unable to use the nutrients in the waste but still allow application at any time when the nutrients (contaminants) will not have an adverse effect. Removal of calendar based restrictions also allow for our changing climate.
129.3	CHRISTEY Anthony	Rule 38		Remove the 1 May-30 September effluent dispersal dates. Clarify wording "landholding".
133.8	Civil Tech Ltd	Rule 38	Amend	Rule 38(d)(iv) on land less than 4 degrees in slope, 20m to property boundaries, 50m to streams and bores.
137.4	CLARKE B D & H J Partnership (Brendon Clarke)	Rule 38	Oppose Amend	Delete Rule 38(d)(iv) and replace with the following: Require one month's storage and can apply during the dryer periods between 1 <sup>st</sup> May to 30 <sup>th</sup> September with a 10m boundary from waterways.
138.4	CLARKE B D & H J Partnership (Hayley Clarke)	Rule 38	Oppose Amend	Rule 38(d)(iv): Require one month's storage and can apply during the dryer periods between 1 May to 30 September, could also have a 10 metre boundary from waterways.
141.6	CLARKE Julie Ann & TUCK Roger	Rule 38	Amend	Amend Rule 38 d(iv) to read when soil conditions allow as per current rules.
152.19	Clover Bell Ltd	Rule 38	Support Amend	We ask that Rule 38(d)(iv) is removed.
188.3	Dairy Farms NZ Ltd	Rule 38	Oppose Amend	Rule 38(d)(iv): Reduce window to 1 June to 31 August.
189.39	Dairy Holdings Ltd	Rule 38		Amend Rule 38(d)(iv) as follows: <del>from 1 May to 30 September in any year, where this</del> <u>when soil and/or weather conditions are otherwise likely to prevent absorption of waste material within a reasonable time, or cause significant run-off of waste material;</u> or
190.18	DairyNZ	Rule 38	Support in part	Retain Rule 38(d)(i)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Amend Rule 38(d)(iv) to: (iv) <del>from 1 May to 30 September in any year</del> <u>appropriate conditions for spreading so that no runoff occurs</u> Or (iv) <del>from 1 May 1 June to 30 June 30 September in any year.</del>  Amend Rule 38(d)(v) to: (v) with <u>an average</u> depth of material of greater than 10 mm on the land surface.
192.14	DALE P T & S B Trust	Rule 38(d)(i)(iv) and (v)	Oppose	Delete.
209.35	DIPROSE Dave	Rule 38	Oppose	That lane scrapping of waste can be spread on surrounding land when scraped from lane from the months of May to September.
217.4	DRISCOLL Timothy & Jocelyn	Rule 38(d)(iv)	Amend	Change I would like to see are: application of solids effluent to pasture is permissible during May to September providing application is at a time when soil moisture levels are suitable (I don't know the number required but perhaps something like the current ES website moisture levels could be an option or an on farm measuring system). Normally there is a suitable period during May to September to apply solid effluent to pasture; bearing in mind that it can also be wet during October and November. Good Farm Management practices should be encouraged at all times of the year.
233.14	DYSON Valerie & Glyn	Rule 38	Support	Retain.
248.4	Erne Hill Ltd	Rule 38(d)(iv) and (d)(iii)	Amend	Amend to remove duplication between Rule 38(d)(iv) and (d)(iii).
259.14	F D Enterprises Ltd	Rule 38	Oppose in part	Delete Rule 38(d)(iv).
264.11	FarmRight Ltd	Rule 38(d)(iv)	Oppose in part	Delete Rule 38(d)(iv).
265.96	Federated Farmers of NZ (Southland Province)	Rule 38	Oppose in part	Delete Rule 38(d) (iv).  Amend 38(d)(v) as follows:  (v) with <u>an average</u> depth of material of greater than 10 mm on the land surface
270.4	Firdale Farms Ltd	Rule 38(d)(iv)	Amend	Amend Rule 38 to allow the application of animal and vegetative waste onto fields when soil

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				conditions allow at any time of the year.
273.2	Flaxwood South	Rule 38(d)(iv)	Amend	Remove time period and replace with the requirement that soil moisture level does not exceed maximum levels set.
276.2	FLETT Robert	Rule 38		Make requiring a consent at council's discretion to retain flexibility.  Delete Rule 38(d)(iv).
277.51	Fonterra Co-operative Group Ltd	Rule 38	Oppose in part	Retain part (d)(iii) that prevents discharges of solid animal waste at times when the soil moisture exceeds field capacity Amend part (d)(iv) to read "from 1 <del>May</del> <u>June</u> to 30 <del>September</del> <u>31 August</u> in any year; or"
279.84	Forest & Bird NZ	Rule 38	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
307.1	GIBSON-SMITH G A	Rule 38(d)(iv)	Oppose	Reduce timeframe or recommend being able to use non-effluent paddocks to discharge over this period (when no rain 7-10 days prior).
313.9	GILLESPIE Maria	Rule 38	Amend	That animal and vegetative waste be applied when soils not at soil moisture field capacity and there is no predicted heavy rainfall within the following week. That a set depth of 10mm per application remains so as to minimise any nutrient loss.
333.5	Greenbush Farms Ltd	Rule 38	Oppose	Remove the restricted timeframe.
339.13	GUNN Olivia	Rule 38	Support	We recommend that Section (d) (iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
351.5	HAMILTON Rosemary	Rule 38(d)(iv)		Remove dates and should be left as a good management practice activity.
352.5	HAMMOND Emma & Peter	Rule 38	Support Oppose	Should be based on prevailing ground conditions at time of discharge as Southland's climate is quite variable. If the reason to restrict the discharge outside of 1 May to 30 September may not always deliver the required outcome.
361.14	HBG AgriLimited	Rule 38(d)(iv)	Support Amend	Replace Section (d)(iv) with conditions based on soil temperatures or conditions as advised by the ES website.
383.1	Hollyvale Farms	Rule 38(d)	Amend	Discharge animal waste when ground conditions are suitable e.g. delete clause (d)(iv) 1 May to 30 September. Also, treat effluent differently to sludge because their characteristics are different. Delete soil temperature 5 degrees C rule.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
386.12	Hopcroft Farms Ltd	Rule 38	Support	I recommend that Section (d) (iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
400.1	HUMPHRIES S M A Family Trust	Rule 38(d)(iv)	Amend	Shorten period of restrictions to June and July but allow application in this period if soil moisture levels are in the green, safe to irrigate zone on the website.
402.16	HUNT Alistair & Bernadette	Rule 38	Amend	Delete Rule 38(d)(iv).
422.2	JAMIESON Rebecca	Rule 38	Oppose	Amend the time frame May to September.
433.9	Kapuka Dairies Ltd	Rule 38	Amend	According to good management practice I feel that this rule could be amended to allow for climate change and should be a permitted activity. With all the tools available – soil moisture meters, soil temperature probes, 10 day weather forecasts – this would allow for an achievable compliant discharge.
451.11	Knockinnon Farm Trust	Rule 38	Support	Dates restrictive as winter for example, winter may in many cases be the only practical time during the year to carry out lane maintenance etc.
454.4	Kyler Pastorals	Rule 38(d)(iv)	Oppose	Allow farmers to discharge solids at any time of the year at appropriate times and at a consented rate.
455.2	Kyler Pastorals	Rule 38(d)(iv)	Oppose	Remove timeframe for discharging solids.
464.21	Landpro Ltd	Rule 38	Oppose in part	Delete Rule 38(d)(iv).
477.9	Longwood Properties Ltd	Rule 38	Amend	We suggest that Rule 38(d)(iv) be removed from Rule 38 or at the very least replaced with tangible parameters to assess soil conditions such as rainfall, soil moisture and soil temperature for example.
478.23	LOVERIDGE David	Rule 38	Support	Support the rule in principle, but we oppose restriction of application between 1 <sup>st</sup> May and 30 <sup>th</sup> September. The maintenance is vital for animal welfare and staff health and safety.
482.17	Lower Aparima Catchment Group	Rule 38(d)(iv)	Support	We recommend that Rule 38(d)(iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
509.6	Matai Farms Ltd	Rule 38	Oppose	Remove time frame and amend so that timing of application is dependant on soil conditions.
510.19	Mataura Butcher Shop Ltd	Rule 38	Oppose	Make permitted.
560.9	MCRAE Tim & Justine	Rule 38	Oppose	Rule 38 (d)(iv) should be removed and rely on 38 (d) (iii) whereby it is subject to soil moisture not exceeding field capacity.
564.14	Mid-Aparima Catchment Group	Rule 38	Support Amend	We recommend that Section (d) (iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
598.19	Newton Slink Skins	Rule 38	Oppose	Make permitted.
603.10	Nithdale Station	Rule 38		Add the word 'average' depth of material of greater than 10mm on the land surface.
621.4	Otara Dairies Ltd	Rule 38	Oppose	Remove the restricted timeframe from Rule 38(iv).
638.8	Pinnacle Farming Company Ltd	Rule 38	Amend	Rule 38(d)(iv): The disposal of animal and vegetative waste to be permitted through the months of May to September under certain guidelines and management practices taking into account ground conditions and good farm practice.
640.43	Pourakino Catchment Group	Rule 38	Oppose	<del>(iv) from 1 May to 30 September in any year; or</del>
644.5	Premier Dairies Ltd	Rule 38	Oppose	Oppose Rule 38-Animal and vegetable waste (d) (iv).
647.10	Progressive Engineering Southland Ltd	Rule 38	Oppose	<del>(iv) From 1 May to 30 September in any year; or</del>
663.6	RDAgritech Ltd	Rule 38	Amend	Delete Rule 38 (d)(iv).
672.7	ROBERTSON Antony	Rule 38	Amend	Remove dates from 1 May to 30 September and allow spreading during appropriate soil moisture conditions.
692.8	ROWE Emma	Rule 38	Amend	The rule of no waste to land from the 1st May to the 30th Sept should be amended to be based on soil moisture levels and rainfall data.
737.25	Smithill Ltd	Rule 38	Oppose in part Support in part	(c) - We oppose this rule as there is no evidence to support a cap of 150kgs of Nitrogen/Ha/year. More information is required to provide scientific evidence of the specified cap.  (d), (iv) - We do not support the restrictive dates being placed in this rule as it is impractical to assume that every year will be the same in weather conditions. Winter months are the most suitable for a dairy farm to undertake maintenance, to maintain workplace health and safety, as well as animal health and welfare. Therefore, we think this rule should be replaced with climatic conditions based on; soil temperatures and overall environmental conditions as per the Environments Southland website.
740.6	South Coast Dairy Ltd	Rule 38(d)(iv)	Oppose	Remove the restricted time frame – discharge conditions are adequately covered by other conditions.
752.131	Southland Fish & Game Council	Rule 38	Support Amend	Amend Rule 38(d)(iv) as follows: “20 metres of the landholding boundary, a bore use for water abstraction, <u>a sub-surface drain</u> , the bed of a river, <u>including ephemeral or intermittently flowing streams</u> , lake, <u>wetland</u> , lake

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				or modified watercourse or the coastal marine Area; or”
759.17	Springlands Group Ltd	Rule 38	Oppose in part	Delete Rule 38(d)(iv).
761.14	STALKER Hanna & Callum	Rule 38	Support	Section (d) (iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
764.1	STEEGHS Partnership	Rule 38(d)(iv)	Oppose	Discharge of waste should be determined by moisture levels in soil not a set timeframe.
766.10	STEVENS Brendon	Rule 38(c)	Support in part	Retain Rule 38(c). Delete Rule 38(d)(iv). Retain Rule 38(d)(v).
777.10	STRATFORD Chris & Lynsey	Rule 38	Oppose	Remove the restricted time frame. Alternatively permit discharge between 1 May-30 September if soil capacity is good, no rainfall expected in the 3 days post application, or other similar rules. Put in a size trigger to permit smaller installations like sumps and stone traps to be cleaned during the restricted timeframe.
789.1	SWNEY Garry & Beverley	Rule 38	Amend	In circumstances such as ours, we feel the application of these mineral tested solids should be a permitted activity, if and when suitable ground conditions allow. This application is anticipated to need to occur twice over that winter period.  Include provision for separated green water from cow barn.
797.48	Nga Runanga and TRONT	Rule 38	Oppose in part	Amend Rule 38(c) to reflect the approach taken in the physiographic zones so that the permitted rate of nitrogen onto any land area from agricultural effluent or water containing agricultural effluent does not exceed the capacity of a specific physiographic zone to accommodate the nitrogen loss  Add new clause: <u>A Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u>
798.1	TEMPLETON Luke	Rule 38		I recommend that Section (d)(iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
799.9	TEMPLETON Peter	Rule 38		Section (d)(iv) should be replaced with conditions based on soil temperatures or conditions as

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				advised by the ES website.
800.7	TEMPLETON Vaughan	Rule 38		Rule 38(d)(iv): This restricts the application between 1 May and 30 <sup>th</sup> September. It is not rational to restrict applications in this period to date only. It would be therefore more rational to look at restrictions on those Physiographic Zones where this is an issue.
801.6	Terrace Farm Trust & Johnrey Trust	Rule 38	Oppose	Rule 38(d)(iv): Replace with a direction linking animal and vegetative waste discharge to soil moisture conditions rather than having a timeframe.
810.42	Three Rivers Catchment Group (TRCG)	Rule 38	Oppose	<del>(iv) from 1 May to 30 September in any year; or</del>
811.23	THYS Herman & STAUT Tinneke	Rule 38	Oppose in part	<p>Rule 38(d)(i): Change once every second month to once a month.</p> <p>Rule 38(d)(iv): Change from 1 May to 30 September to ‘from 1 May to 15 August’. And add a condition that the soil moisture level needs to be below 95% field capacity.</p> <p>Rule 38(d)(v) Allow for temporary storage for visually low risk material as long as there is no direct risk for the environment.</p>
813.9	Tihaka Farms	Rule 38(d)(iv)	Amend	We suggest that (d)(iv) be removed from Rule 38; or at the very least replaced with tangible parameters to assess soil conditions.
822.6	Tremaine Farming Partnership	Rule 38	Support	Amend this rule to allow solid effluent to be discharged during period 1 June - 31 August pursuant to a resource consent only.
823.3	TROTTER Bruce & VAN ROSSUM Winy	Rule 38(d)(iv)	Oppose	Amend to allow discharge between 1 May – 30 September.
832.98	VAN GOOL Raewyn	Rule 38	Support	<p>Retain Rule 38(a) to (d)(iii).</p> <p>Amend Rule 38(d)(iv) to add ‘unless soil moisture conditions as shown via soil moisture monitoring devices allow’.</p> <p>Retain Rule 38(d)(iv) &amp; 38(d)(v).</p>
834.7	VAN ROSSUM Winy & Maarten	Rule 38	Amend	Where the rule states “from 1 May to 30 September in any year”. We would like to amend this by adding, “unless there has been no rainfall <10mm over a 5 day period before and after application, as predicted by the local weather forecast.” We would prefer this value (<10mm over 5 days) to be based upon proven scientific evidence, where no drainage event and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				therefore loss of N and P occurs under this given value over the range of days stated.
838.1	VERSTEYNNEN Robert	Rule 38	Amend	Rule 38(d)(iv) should be related to soil field capacity not month of application.
839.1	VRIES Ferdinand	Rule 38	Oppose	Delete clause (d) (iv) from 1 May to 30 September in any year.
842.9	Waihoaka Holdings Ltd	Rule 38	Amend	We suggest that (d)(iv) be removed from Rule 38; or at the very least replaced with tangible parameters to assess soil conditions.
849.3	WARNOCK Barry	Rule 38	Oppose	Delete rule (iv) as the winter dry period is the best time of the year to do lane maintenance and lightly spread lane scrapings onto paddocks, there is little risk with this practise as the scrapings are mostly vegetative, very minimal amount of animal waste.
861.24	WHITE John Copeland	Rule 38	Support	We recommend that Section (d) (iv) should be replaced with conditions based on soil temperatures or conditions as advised by the ES website.
863.5	Whiterig Dairy Farm	Rule 38	Neutral	Dates are unrealistic Southland can be dry during the restricted dates. Consider using soil moisture as a guide. Farmers need to do lane maintenance during winter months.
877.53	WILSON Aaron	Rule 38	Support in part	Rule 38(d)(iv) needs to be deleted. Industry good GMPs should drive the day to day decision making process on farm.
880.57	WILSON Shannon	Rule 38	Support in part	Rule 38(d)(iv) needs to be deleted. Industry good GMPs should drive the day to day decision making process on farm.
896.1	Zonneveldfarms Ltd	Rule 38		Retain Rule 38(a). Amend (d) to: (i) The two month timeframe between applications of waste to land to be reduced to one month but at lower application rates (iv) Recommend that the current two month ban on discharging waste products between June and July remains standing for farms. Farm management plans would need to be put into place for each farms so they can maintain or make adjustment to their current systems to meet consent regulations.

### Rule 39 – Other agricultural effluent disposal

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.100	Aratiatia Livestock Ltd	Rule 39	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
187.1	D Thompson Contracting Ltd	Rule 39	Oppose	The spreading of effluent should be based on ground conditions, not the months of the year. If surface water or ponding is present then no effluent should be spread no matter what month of the year it is, however, if ground conditions are dry then the spreading of effluent should be permitted no matter what month of the year.
279.85	Forest & Bird NZ	Rule 39	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
381.23	HOLDER Wendy & Tom	Rule 39		Change from discretionary to non complying.
510.20	Mataura Butcher Shop Ltd	Rule 39	Oppose	Make permitted.
598.20	Newton Slink Skins	Rule 39	Oppose	Make permitted.
640.44	Pourakino Catchment Group	Rule 39	Support	Retain.
697.9	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 39	Support	Retain.
752.132	Southland Fish & Game Council	Rule 39	Support	Retain.
810.43	Three Rivers Catchment Group (TRCG)	Rule 39	Support	Retain.
832.99	VAN GOOL Raewyn	Rule 39	Support	Retain.

#### Rule 40 - Silage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.101	Aratiatia Livestock Ltd	Rule 40	Support	Retain.
25.31	Ardel Dairies Ltd	Rule 40	Oppose	Amend so existing pads are managed to best practise and set new pits as of best practice.
47.19	Balfour, Wendonside & Waikaia Group	Rule 40	Support in part Amend	Clarify the intention of Rule 40(a)(vi). Amend to “no part of the silage storage facility is <del>on-land</del> located within the vicinity of a classified <del>as a</del> HAIL site under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011;”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
69.2	Best AG Ltd	Rule 40(a)(iii)	Amend	Retain that no silage leachate should discharge into surface water and that as much as possible, leachate onto the ground should be minimised.
79.7	BLAIR Phillipa Mary	Rule 40	Amend	Delete matter of discretion 4.
89.35	BRENTLEIGH Family Trust	Rule 40	Support	Retain.
92.14	Bristol Grove Dairies	Rule 40(a)(vii)	Oppose	“Permanently or intermittently wet”, it is impossible to have silage stored on land that never gets wet. Please clarify.
99.7	BUCKINGHAM Greta	Rule 40	Amend	Delete matter of discretion 4.
101.7	BUCKINGHAM Thomas	Rule 40	Amend	Delete matter of discretion (4).
109.5	C F L Farms Ltd	Rule 40		Make relevant to town boundaries but in regard to rural people and winter feed smells, it is no worse than a paddock of crop when wet. This ruling is perhaps more relevant to properties that are nearer to town boundaries, not where the nearest neighbour is 3km away.
114.6	CALLAHAN Pamela	Rule 40	Oppose	Farmers should be educated on how to manage a well planned silage pit not told what size they need.
123.5	Caughey Ltd	Rule 40	Oppose	No specific decision requested.
152.20	Clover Bell Ltd	Rule 40	Support Amend	We ask that part (a)(1) is changed by replacing the words ‘the activity does not cause any discharge that results in a noxious, dangerous etc...’ all practical steps are taken to reduce noxious, dangerous etc...’.
165.2	Cook Farming Co Ltd	Rule 40	Oppose	Remove restriction of one silage pit per landholding.
173.5	COWIE Martin	Rule 40	Oppose	Delete matter of discretion 4.
189.40	Dairy Holdings Ltd	Rule 40		Amend Rule 40(a)(vii) as follows: no part of the silage storage facility is on land that is made permanently or intermittently wet by the presence of springs, seepage, high groundwater, ephemeral streams, or flows of stormwater <u>(other than those flows coming off the silage covers in rainfall, which cannot be avoided).</u>  Amend Rule 40(a)(v)(3) and Rule 40(b)(i)(4) as follows: the microbial health protection zone of a drinking water supply site identified in Appendix J, or where no such zone is identified, then <del>250</del> <u>100</u> metres of the abstraction point of a drinking water supply site identified in Appendix J

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
190.19	DairyNZ	Rule 40(a)(iii)	Support Amend	Amend to: (iv) there is no discharge of contaminants from the silage storage facility to any surface <del>water</del> <del>or groundwater</del> or naturally occurring wetland;
205.31	Dillon Ag Ltd (Chris Dillon)	Rule 40	Support	Retain.
206.31	Dillon Ag Ltd (Rochelle Dillon)	Rule 40	Support	Retain.
209.36	DIPROSE Dave	Rule 40	Oppose	There is no discharge of contaminants from the silage storage facility to any surface <del>or</del> <del>groundwater</del> or naturally occurring wetland;
218.4	Drumderg Farm & Melgan Ltd	Rule 40		Come spring we spread the old silage and effluent on paddocks in the process of tidying up the rock pads for next year's silage. This needs to be a permitted activity.
233.15	DYSON Valerie &Glyn	Rule 40	Support	Retain.
258.15	Eyre Creek Ltd	Rule 40	Support in part	(iii) delete the words 'or groundwater'. On 40 (c) replace 'non-complying' with 'Controlled'. Condense silage regulation into one rule.
259.15	F D Enterprises Ltd	Rule 40	Support in part	No changes are sought.
265.97	Federated Farmers of NZ (Southland Province)	Rule 40	Support in part	Combine Rule 40 and 41.  Amend 40 (a)(iii) as follows:  (iii) there is no discharge of contaminants from the silage storage facility to any surface <del>or</del> <del>groundwater</del> or naturally occurring wetland;  In 40(c) delete "non-complying" and replace with "discretionary".  Amend the note as follows:  An application for resource consent under Rule 40(b) will be processed and considered without public or limited notification. <del>unless the applicant requests notification Environment Southland considers that special circumstances exist that warrant notification of the</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				application.  Amend Rules 40(a)(v)(3) and 40(b)(i)(4) to read: <u>The discharge does not occur within the microbial health protection zone of any drinking water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
270.5	Firdale Farms Ltd	Rule 40	Amend.	Any new silage storage facilities need to be sealed and leachate contained or transferred to effluent storage pond.
277.52	Fonterra Co-operative Group Ltd	Rule 40	Oppose in part	Amend Rule 40 to remove any reference to discharges to air. Delete Rule 40(a)(iii).
279.86	Forest & Bird NZ	Rule 40	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
314.7	Gladvale Farms Ltd	Rule 40(a)(i)	Oppose	Delete.
319.17	Glendhu Dairies Ltd	Rule 40	Oppose	Amend the 50 metres from any surface water body to 25 metres provided there is no visible leachate entering water body.
372.10	Heritage NZ	Rule 40	Support in part Amend	Retain Rule 40(a)(iv)&(b) & 5 associated matter of discretion 3. OR If Heritage New Zealand relief above is accepted – Amend Rule 40(a)(iv) as follows: <u>the activity does not modify, damage or destroy any recorded historic heritage site; there are no recorded historic heritage sites, at the site of the activity.</u>
386.13	Hopcroft Farms Ltd	Rule 40	Oppose	I recommend you review Rule 40 Silage in relation to HAIL sites.
400.2	HUMPHRIES S M A Family Trust	Rule 40(a)(iii)	Amend	If leachate was diluted with water to a suitable ratio, it could be dispersed/trickled onto a planted wetland area and the main solid contaminates were also captured.
464.22	Landpro Ltd	Rule 40	Support	We seek the ES provides some clarity of the intention of Rule 40(a)(vi). We propose the rule read as follows for clarity: “no part of the silage storage facility is <del>on land</del> located within 50m of a classified <del>as a</del> HAIL site under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011;”
482.18	Lower Aparima Catchment Group	Rule 40	Oppose	We recommend you review Rule 40 Silage in relation to HAIL sites.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
485.2	M B Dillon	Rule 40 (a)(i)	Oppose	Remove reference to what is an objectionable odour.
502.7	MARSHALL Allan & Kathryn	Rule 40	Amend	Delete restrictions on silage stack.
507.7	MARSHALL Spencer	Rule 40	Amend	Remove restrictions on dimensions of a stack.
510.21	Mataura Butcher Shop Ltd	Rule 40	Oppose	Make permitted.
544.3	MCLEOD Bruce & Cynthia	Rule 40	Amend	Amend to allow temporary facilities that are changed regularly.
583.24	MOSEBY Ryan	Rule 40	Amend	Amend rule to remove non-complying status.
590.11	Mt Linton Station	Rule 40	Support	Retain.
598.21	Newton Slink Skins	Rule 40	Oppose	Make permitted.
603.11	Nithdale Station	Rule 40		Rule 40 – (a) (vi) needs to be clarified in relation to activities on farms.
604.7	Nokomai Station Ltd	Rule 40	Support	Retain.
604.8	Nokomai Station Ltd	Rule 40	Support	Retain.
638.9	Pinnacle Farming Company Ltd	Rule 40	Amend	We support the requirement to have a solid impermeable base to the silage storage area, however, a 5 year time period to complete appropriate storage would be fair.
640.45	Pourakino Catchment Group	Rule 40	Amend	(iii) there is nor discharge of contaminants from the silage storage facility to any surface <u>water</u> or <del>groundwater</del> or naturally occurring wetland.
646.6	Progress Valley Farms Ltd	Rule 40	Amend	Delete matter of discretion 4.
647.11	Progressive Engineering Southland Ltd	Rule 40	Amend	(iii) there is no discharge of contaminants from the silage storage facility to any surface <u>water</u> or groundwater or naturally occurring wetland;
692.9	ROWE Emma	Rule 40		How is it monitored how much leachate comes from a silage stack over a one year period? Perhaps if it is stored for longer than a set amount of time it should be stored in a lined storage.
697.10	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 40	Support	Retain.
711.13	SCOTT G D & M M	Rule 40	Support	Retain.
712.33	Seaview Trust & Oraka Farms Ltd	Rule 40		Recommend that silage be treated as a permitted activity and covered as a GMP.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.133	Southland Fish & Game Council	Rule 40		<p>Retain Rule 40 as notified and amend Rule 40(v)(1) as follows:</p> <p>(v) 50 metres of any <i>sub-surface drain</i>, surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u>, <del>or naturally occurring wetland</del>, <del>or any</del> potable water abstraction <u>or the Coastal Marine Area.</u>”</p> <p>Amend all references that refer to distances from any surface waterbody to provide:</p> <p>“. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u>, or artificial watercourse . . .”</p>
759.18	Springlands Group Ltd	Rule 40	Support Amend	We seek that ES provides some clarity of the intention of Rule 40(a)(vi). We propose the rule read as follows for clarity: “no part of the silage storage facility is <del>on land</del> located within the vicinity of a classified <del>as a</del> HAIL site under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011;”
777.11	STRATFORD Chris & Lynsey	Rule 40	Neutral	<p>Realise that this rule implies that a sealed surface may be required. Understand that if this is the case, there will be significant costs associated which may be very difficult for farming businesses to bear in the current economic environment and which may still be impacted by the future limit setting process.</p> <p>Be clear when articulating what is required.</p>
792.29	TAYLER Matthew	Rule 40	Support	Retain.
802.30	The 254 Partnership & Gerken Family Trust	Rule 40	Support	Retain.
810.44	Three Rivers Catchment Group (TRCG)	Rule 40	Amend	(iii) there is no discharge of contaminants from the silage storage facility to any surface <u>water</u> or <del>groundwater</del> <del>or</del> naturally occurring wetland
832.100	VAN GOOL Raewyn	Rule 40	Support	Except for 40(a)(iii) I support this rule.
845.5	WALLACE Bruce & Maree	Rule 40	Amend	Concrete and sump to be in place – 5 years.
861.25	WHITE John Copeland	Rule 40	Oppose	<p>We recommend you review Rule 40 Silage in relation to HAIL sites.</p> <p>Rule 40 (b)(ii): I recommend the same buffer as any other waterbody in relation to silage stacks and storage.</p>
863.6	Whiterig Dairy Farm	Rule 40	Neutral	Delete ‘any surface or groundwater’ in part 40(a)(iii). What is involved with consent if non-complying? Costs and process involved with getting consent for your silage as is today. Financially farmers are in no position to put in silage pads. Set a realistic time frame into

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				achieving this i.e. 10 years.
868.21	Wilkins Farming Ltd	Rule 40	Support in part	(iii) delete the words 'or groundwater'. On 40 (c) replace 'non-complying' with 'controlled.' Condense silage regulation into one rule.

### Rule 41 – Silage leachate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.102	Aratiatia Livestock Ltd	Rule 41	Support	Retain.
25.32	Ardel Dairies Ltd	Rule 41	Oppose	Delete.
47.20	Balfour, Wendonside & Waikaia Group	Rule 41	Support	Retain.
189.41	Dairy Holdings Ltd	Rule 41		Amend Rule 41(a)(iv)(1): overland flow <u>where contaminants may enter water</u> , or <u>significant</u> ponding of silage leachate
190.20	DairyNZ	Rule 41	Support Amend	Amend Rule 41(a)(iv)(2) to: 2) <u>an average</u> depth of application in excess of 10 millimetres for each individual application;
218.5	Drumderg Farm & Melgan Ltd	Rule 41		Come spring we spread the old silage and effluent on paddocks in the process of tidying up the rock pads for next year's silage. This needs to be a permitted activity.
233.16	DYSON Valerie & Glyn	Rule 41	Support	Retain.
258.16	Eyre Creek Ltd	Rule 41	Support in part	Amend 41 (a) (iv) (2) to read "average depth of application...".
259.16	F D Enterprises Ltd	Rule 41	Support	No changes are sought.
265.98	Federated Farmers of NZ (Southland Province)	Rule 41	Support in part	Combine Rule 40 and 41.  Amend 41 (a)(iv)(2) as follows: (2) <u>average</u> depth of application in excess of 10 millimetres for each individual application;  Amend Rules 41(a)(viii) and 41(a)(iii)(4) to read: <u>The discharge does not occur within the microbial health protection zone of any drinking</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
277.53	Fonterra Co-operative Group Ltd	Rule 41	Support	Retain.
279.87	Forest & Bird NZ	Rule 41	Support with amendments	Insert Coastal Marine Area including lagoons and estuaries, and ephemeral streams in all rules.
319.18	Glendhu Dairies Ltd	Rule 41	Oppose	Delete.
464.23	Landpro Ltd	Rule 41	Support	Retain.
510.22	Mataura Butcher Shop Ltd	Rule 41	Oppose	Make permitted.
590.12	Mt Linton Station	Rule 41	Support	Retain.
598.22	Newton Slink Skins	Rule 41	Oppose	Make permitted.
604.9	Nokomai Station Ltd	Rule 41	Support	Retain.
647.12	Progressive Engineering Southland Ltd	Rule 41	Oppose	(iv) any discharge does not result in: (1) overland flow or ponding of silage leachate, (2) depth of application in excess of <u>an average</u> of 10 millimetres for each individual application;
681.16	Rockytommy Farming Ltd	Rule 41	Support	Retain.
682.12	Rokenwai Farming Ltd	Rule 41	Support	Retain.
697.11	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 41	Support	Retain.
712.34	Seaview Trust & Oraka Farms Ltd	Rule 41		Recommend this is combined with rule 40. Recommend no rule be required for discharge of silage leachate and should be covered as a GMP.
737.26	Smithill Ltd	Rule 41	Support	Retain.
752.134	Southland Fish & Game Council	Rule 41	Amend	Amend all references that refer to distances from any surface waterbody to provide: “. . . metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . .”
759.19	Springlands Group Ltd	Rule 41	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
766.11	STEVENS Brendon	Rule 41	Support	Retain.
797.49	Nga Runanga and TRONT	Rule 41	Oppose in part	<p>Amend rule (a)(iv)(3) to reflect the approach taken in the physiographic zones so that the permitted rate of nitrogen onto any land area from agricultural effluent or water containing agricultural effluent does not exceed the capacity of a specific physiographic zone to accommodate the nitrogen loss.</p> <p>Add new clause:</p> <p><u>A Management Plan is prepared and implemented in accordance with Appendix N, including the mitigations relevant to the farming activity being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the landholding on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants.</u></p> <p>Amend Rule 41(b) to read:</p> <p>The discharge of silage leachate to land that does <u>not</u> meet the conditions in Rule 41(a) is a discretionary activity</p>
832.101	VAN GOOL Raewyn	Rule 41	Support	Retain.
868.22	Wilkins Farming Ltd	Rule 41	Support in part	Amend 41 (a)(iv)(2) to read: average depth of application...
877.54	WILSON Aaron	Rule 41	Support	Retain.
880.58	WILSON Shannon	Rule 41	Support	Retain.

#### Rule 42 – Cleanfill sites

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
10.2	Aggregate & Quarry Association of NZ	Rule 42	Support	Retain.
24.103	Aratiatia Livestock Ltd	Rule 42	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
152.21	Clover Bell Ltd	Rule 42	Support	Retain.
279.88	Forest & Bird NZ	Rule 42	Support with minor amendments	Amend all references in the Landfills section of the pWLP that refer to “discharges do not occur within the bed of a lake or river” to provide:“discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral streams and gullies or within the coastal marine area.</u> ”
288.31	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 42	Support in part	<p>Amend Rule 42 to provide for cleanfill discharges that do not comply with Rule 42(a)(i) only as a controlled activity.</p> <p>Rule 42 – Cleanfill sites</p> <p>(a) The discharge of cleanfill into or onto land at a cleanfill site in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met:</p> <p>(i) the total amount of cleanfill discharged at all cleanfill sites on a landholding does not exceed 500 cubic metres;</p> <p>(ii) the discharge does not occur within:</p> <p>(1) the bed of a lake or river;</p> <p>(2) 50 metres of a surface waterbody, artificial watercourse, the coastal marine area, or landholding boundary;</p> <p>(3) the flood banks of the Waiau, Aparima, Ōreti or Mataura rivers, or 50 metres of these rivers where flood banks are not present;</p> <p>(4) 100 metres of a water abstraction point;</p> <p>(iii) the activity does not modify, damage or destroy any recorded historic heritage sites;</p> <p>(iv) stormwater is directed away from the discharge site.</p> <p><u>(b) The discharge of cleanfill into or onto land at a cleanfill site in circumstances where contaminants may enter water that does not meet condition (i) of Rule 42(a) is a controlled activity.</u></p> <p><del>(bc)</del> The discharge of cleanfill into or onto land at a cleanfill site in circumstances where contaminants may enter water that does not meet one or more of the conditions of Rule 42(a) is a restricted discretionary activity.</p> <p><u>Environment Southland will restrict its control to the following matters:</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>1. design, construction and management of the cleanfill site;</u>  <u>2. post-closure management practices and procedures;</u>  <u>3. information and monitoring requirements;</u>  <u>4. the quantity of cleanfill to be discharged</u></p> <p>Environment Southland will restrict its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. prevention of inundation of any other person's landholding, sedimentation in any waterbody, erosion and land instability, or the restriction or diversion of flood flows or coastal water;</li> <li>2. site selection and effects on sensitive receiving environments;</li> <li>3. effects on historic heritage;</li> <li>4. design, construction and management of the cleanfill site;</li> <li>5. post-closure management practices and procedures;</li> <li>6. information and monitoring requirements;</li> <li>7. the quantity of cleanfill to be discharged.</li> </ol> <p>An application for resource consent under Rule 42(b <u>and c</u>) will be processed and considered without public or limited notification unless the applicant requests notification or Environment Southland considers special circumstances exist that warrant notification of the application.</p>
342.8	H W Richardson Group	Rule 42	Oppose in part	<p>Amend rule to align with the recently operative Southland District Plan rule for cleanfill activities.</p> <p>(2) <del>50</del> <u>20</u> metres of a surface waterbody, artificial watercourse, the coastal marine area, or landholding boundary;</p>
372.11	Heritage NZ	Rule 42	Support in part Amend	<p>Retain Rule 42(a)(iii)&amp;(b)3.</p> <p>If Heritage New Zealand relief above is accepted – Amend Rule 42(a)(iii) as follows:  <del>the activity does not modify, damage or destroy any recorded historic heritage site; there are no recorded historic heritage sites, at the site of the activity.</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
381.24	HOLDER Wendy & Tom	Rule 42		Add a 5 <sup>th</sup> restraint in keeping with MFE guidelines: 5. 'the flood plain of a river or waterbody.'
411.33	Invercargill City Council	Rule 42	Amend	That Rule 42(a)(i) is amended to provide for 2000m <sup>3</sup> of clean fill in the rural areas.
449.20	KiwiRail Holdings Ltd (KiwiRail)	Rule 42	Amend	Amend as follows: (a) The discharge of cleanfill into or onto land at a cleanfill site in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met: (i) the total amount of cleanfill discharged at all cleanfill sites on a landholding does not exceed 500 cubic metres <b>per calendar year</b> ; (ii) the discharge does not occur within: (1) the bed of a lake or river; (2) 50 metres of a surface waterbody, artificial watercourse, the coastal marine area, or landholding boundary; (3) the flood banks of the Waiau, Aparima, Ōreti or Mataura rivers, or 50 metres of these rivers where flood banks are not present; (4) 100 metres of a water abstraction point; (iii) the activity does not modify, damage or destroy any recorded historic heritage sites; (iv) stormwater is directed away from the discharge site.
510.23	Mataura Butcher Shop Ltd	Rule 42	Oppose	Make permitted.
598.23	Newton Slink Skins	Rule 42	Oppose	Make permitted.
752.135	Southland Fish & Game Council	Rule 42	Oppose	Amend to: "discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral or intermittently flowing streams</u> ." And ". . . X metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams</u> , or artificial watercourse . . ."
832.102	VAN GOOL Raewyn	Rule 42	Support	Retain.
877.55	WILSON Aaron	Rule 42	Support	Retain.
880.59	WILSON Shannon	Rule 42	Support	Retain.



## Rule 43 – Farm landfills

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.104	Aratiatia Livestock Ltd	Rule 43	Support	Retain.
27.5	Arkley Farm Ltd	Rule 43	Support	Retain.
31.9	AYERS Warren	Rule 43	Support	Retain.
792.30	TAYLER Matthew	Rule 43	Support	Retain.
152.22	Clover Bell Ltd	Rule 43	Support	Retain.
209.37	DIPROSE Dave	Rule 43	Support	Retain.
233.17	DYSON Valerie &Glyn	Rule 43	Amend	Amend rule 43 to include carcasses and offal.
258.17	Eyre Creek Ltd	Rule 43	Support	Retain.
265.99	Federated Farmers of NZ (Southland Province)	Rule 43	Support in part	Delete the words ‘carcasses’ and ‘offal’ from condition 43(a)(ii).  Amend Rule 43(a)(viii) to read: <u>The discharge does not occur within the microbial health protection zone of any drinking water supply site listed in Appendix J or if no zone is identified, within 250 metres of the abstraction point of a drinking water supply site listed in Appendix J except for discharges which were lawfully established prior to the establishment of the drinking water supply site.</u>
279.89	Forest & Bird NZ	Rule 43	Support with minor amendments	Amend all references in the Landfills section of the pWLP that refer to “discharges do not occur within the bed of a lake or river” to provide:“discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral streams and gullies</u> or within the coastal marine <u>area</u> .”
299.19	GARDYNE John	Rule 43	Oppose	Remove carcasses and offal.
352.6	HAMMOND Emma & Peter	Rule 43	Support	Retain.
372.12	Heritage NZ	Rule 43	Support in part Amend	Retain Rule 43(a)(iv). OR If Heritage New Zealand relief above is accepted – Amend Rule 43(a)(iv) as follows: <del>the activity does not modify, damage or destroy any recorded historic heritage site; there are no recorded historic heritage sites, at the site of the activity.</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
387.19	HORRELL Andrew Russell	Rule 43	Support	Retain.
402.17	HUNT Alistair & Bernadette	Rule 43	Amend	Remove “carcasses and offal” from 43 (a)(ii).
433.10	Kapuka Dairies Ltd	Rule 43	Support Amend	Support but include education around farm landfill sites.
510.24	Mataura Butcher Shop Ltd	Rule 43	Oppose	Make permitted.
556.9	MCRAE Joe	Rule 43	Support	Retain.
557.8	MCRAE Matt	Rule 43	Support	Retain.
558.11	MCRAE Natalie	Rule 43	Support	Retain.
560.10	MCRAE Tim & Justine	Rule 43	Support	Retain
583.25	MOSEBY Ryan	Rule 43	Support	Retain.
590.13	Mt Linton Station	Rule 43	Support	Retain.
598.24	Newton Slink Skins	Rule 43	Oppose	Make permitted.
640.46	Pourakino Catchment Group	Rule 43	Support	Retain.
711.14	SCOTT G D & M M	Rule 43	Support	Retain.
752.136	Southland Fish & Game Council	Rule 43	Oppose	Retain and amend to: “discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral or intermittently flowing streams.</u> ” And “ . . . X metres of any surface waterbody, <u>including wetland and ephemeral or intermittently flowing streams,</u> or artificial watercourse . . .”
810.45	Three Rivers Catchment Group (TRCG)	Rule 43	Support	Retain.
832.103	VAN GOOL Raewyn	Rule 43	Support	Retain.
868.23	Wilkins Farming Ltd	Rule 43	Support	Retain.
877.56	WILSON Aaron	Rule 43	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.60	WILSON Shannon	Rule 43	Support	Retain.

#### Rule 44 – Dead holes (offal pits)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.105	Aratiatia Livestock Ltd	Rule 44	Support	Retain.
27.6	Arkley Farm Ltd	Rule 44	Support	Retain.
31.10	AYERS Warren	Rule 44	Support	Retain.
40.11	BAKER David	Rule 44	Support	Retain.
76.3	BLACKMORE Peter	Rule 44	Support	Retain.
78.4	BLACKMORE Warren	Rule 44	Support	Retain.
99.8	BUCKINGHAM Greta	Rule 44	Support	Retain.
101.8	BUCKINGHAM Thomas	Rule 44	Support	Retain.
108.85	BYTHELL Jesse	Rule 44	Support	I support Rule 44 and would seek to add ‘naturally occurring wetland’ to clause 44 (c)(iv)(1).
152.23	Clover Bell Ltd	Rule 44	Support	Retain.
209.38	DIPROSE Dave	Rule 44	Support	Retain.
220.17	Drylands Farming Ltd	Rule 44	Support Amend	Amend Rule 44(a)(ii) to allow for combustible material to go into an offal for the purpose of burning carcasses as to avoid pathogens entering air or water.
221.17	DRYSDALE Family Trust	Rule 44	Support Amend	Amend Rule 44(a)(ii) to allow for combustible material to go into an offal for the purpose of burning carcasses as to avoid pathogens entering air or water.
233.18	DYSON Valerie &Glyn	Rule 44	Oppose	Delete Rule 44.
258.18	Eyre Creek Ltd	Rule 44	Support	Retain.
279.90	Forest & Bird NZ	Rule 44	Support with minor amendments	Amend all references in the Landfills section of the pWLP that refer to “discharges do not occur within the bed of a lake or river” to provide:“discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral streams and gullies</u> or within the coastal marine area.”

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
297.12	GARDYNE Hugh & Kathie	Rule 44(a)(iii)(2)		Suggest 20 metres and 50 metres respectively, with proviso that site is eventually or progressively covered with soils or similar material.
352.7	HAMMOND Emma & Peter	Rule 44	Support	Retain.
372.13	Heritage NZ	Rule 44	Support in part Amend	Retain Rule 44(a)(iv)&(c)(v).
387.20	HORRELL Andrew Russell	Rule 44	Support	Retain.
394.5	HUDSON O F & S M	Rule 44	Oppose	Delete.
461.6	LAMB Bruce & Gaye	Rule 44	Support	Amend so offal pits are not located with 300 metres of a dwelling on an adjacent property or 100 metres of a boundary.
502.8	MARSHALL Allan & Kathryn	Rule 44	Support	Retain.
507.8	MARSHALL Spencer	Rule 44	Support	Amend so offal pits are not to be located within 300m of a dwelling on an adjacent property or 100m of a boundary.
510.25	Mataura Butcher Shop Ltd	Rule 44	Oppose	Make permitted.
556.10	MCRAE Joe	Rule 44	Support	Retain.
557.9	MCRAE Matt	Rule 44	Support	Retain.
558.12	MCRAE Natalie	Rule 44	Support	Retain.
560.11	MCRAE Tim & Justine	Rule 44	Support	Retain
583.26	MOSEBY Ryan	Rule 44	Support	Retain.
590.14	Mt Linton Station	Rule 44	Support	Retain.
598.25	Newton Slink Skins	Rule 44	Oppose	Make permitted.
603.12	Nithdale Station	Rule 44		Remove the requirement for burial. Over the lambing/calving period to shift dead animals from within 20m of waterways where possible.
640.47	Pourakino Catchment Group	Rule 44	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
646.7	Progress Valley Farms Ltd	Rule 44	Support	Offal pits, often also used as rubbish holes, should be located within 300m of a dwelling on an adjacent property or 100m of a boundary.
666.22	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 44	Support	Retain.
700.5	Rural Solutions Ltd	Rule 44		Restricting the use of a dead hole to stock derived from the same landholding is unnecessary. This will restrict smaller holdings that often currently use a common dead hole.
711.15	SCOTT G D & M M	Rule 44	Support	Retain.
737.27	Smithill Ltd	Rule 44	Support	Retain.
752.137	Southland Fish & Game Council	Rule 44	Support Amend	Retain and amend Rule 44(a)(iii) to provide: (iii) the discharge of carcass or offal does not occur within: (1) The bed of a <u>wetland</u> , lake or river (including ephemeral <u>or intermittently flowing streams</u> ), a gully, or a swale; 50 metres of a <u>any sub-surface drain</u> , surface waterbody, <u>including wetland or ephemeral or intermittently flowing streams</u> , artificial watercourse or the coastal marine area, or 150 metres of a surface waterbody where the discharge is to loose gravels;”
792.31	TAYLER Matthew	Rule 44	Support	Retain.
810.46	Three Rivers Catchment Group (TRCG)	Rule 44	Support	Retain.
832.104	VAN GOOL Raewyn	Rule 44	Support	Retain.
866.4	WILKINS Brendan	Rule 44	Support	Retain.
868.24	Wilkins Farming Ltd	Rule 44	Support	Retain.
869.8	WILKINS Pam	Rule 44	Support	Retain.
877.57	WILSON Aaron	Rule 44	Support	Retain.
880.61	WILSON Shannon	Rule 44	Support	Retain.

## Rule 45 - Landfills

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.91	Forest & Bird NZ	Rule 45	Support with minor amendments	Amend all references in the Landfills section of the pWLP that refer to “discharges do not occur within the bed of a lake or river” to provide:“discharges do not occur within the bed of a <u>wetland</u> , lake or river, <u>including ephemeral streams and gullies</u> or within the coastal marine area.”
510.26	Mataura Butcher Shop Ltd	Rule 45	Oppose	Make permitted.
598.26	Newton Slink Skins	Rule 45	Oppose	Make permitted.
752.138	Southland Fish & Game Council	Rule 45	Support	Retain.
832.105	VAN GOOL Raewyn	Rule 45	Support	Retain.
877.58	WILSON Aaron	Rule 45	Support	Retain.
880.62	WILSON Shannon	Rule 45	Support	Retain.

#### Rule 46 – Land contaminated by a hazardous substance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.39	Ballance Agri-Nutrients	Rule 46	Support in part	Remove reference to Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC) 2000. See original submission for detail.
449.21	KiwiRail Holdings Ltd (KiwiRail)	Rule 46	Amend	Amend as proposed: Rule 46 – Land contaminated by a hazardous substance (a) The discharge of contaminants from land contaminated by a hazardous substance onto or into land in circumstances which may result in contaminants entering water is a permitted activity provided: (i) the hazardous substance in the discharge results from an activity authorised by a rule in this Plan or a resource consent <b><u>or an existing lawfully established activity</u></b> ; and...
752.139	Southland Fish & Game Council	Rule 46	Support	Retain.
803.42	The Fertiliser Association of NZ	Rule 46	Support in part Amend	Amend Rule 46 as follows: (a) The discharge of contaminants from land contaminated by a hazardous substance onto or into land in circumstances which may result in contaminants entering water is a permitted activity provided:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(i) the hazardous substance in the discharge results from an activity authorised by a rule in this Plan or a resource consent; and (ii) the discharge does not result in a breach of the <u>‘Trigger values for toxicants’, presented in Table 3.4.1 in the Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC) 2000</u> at the level of protection set in those guidelines for 80% of species, except for benzene where the level of protection is 90% of species (i.e. 1 milligram per litre), at the nearest of: ...
247.13	Environment Southland	Rule 46	Amend	Amend Rule 46(a)(i) to delete the final “and” and replace with “or”.
279.92	Forest & Bird NZ	Rule 46	Support	Retain.
381.25	HOLDER Wendy & Tom	Rule 46		Rule 46 (c) should be noncomplying to protect water health.
612.2	NZ Fire Service Commission	Rule 46	Amend	Amend Rule 46 as follows by adding:  (a) The discharge of contaminants from land contaminated by a hazardous substance onto or into land in circumstances which may result in contaminants entering water is a permitted activity provided:  (i) .....  (ii) .....  (iii) .....  (iv) <u>The discharge of contaminants is a result of firefighting emergency response and / or training activities (regardless of (i) to (iii) above</u>
661.41	Ravensdown Ltd	Rule 46	Support in part	Ravensdown seeks for Rule 46 (a) (ii) to be amended as follows: (ii) the discharge does not result in a breach of the <u>‘Trigger values for toxicants’, presented in Table 3.4.1 in the Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC) 2000 ...</u> ”
832.106	VAN GOOL Raewyn	Rule 46	Support	Retain.
895.53	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 46	Amend	Amend as follows Rule 46 – Land contaminated by a hazardous substance (a) The discharge of contaminants from land contaminated by a hazardous substance onto or into land in circumstances which may result in contaminants entering water is a permitted

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				activity provided: (i) the hazardous substance in the discharge results from an activity authorised by a rule in this Plan or a resource consent; <del>and</del> <u>or</u> .....
895.54	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 46	Amend	Rule 46 – Land contaminated by a hazardous substance (a) The discharge of contaminants from land contaminated by a hazardous substance onto or into land in circumstances which may result in contaminants entering water is a permitted activity provided: (i) the hazardous substance in the discharge results from an activity authorised by a rule in this Plan or a resource consent; <del>and</del> <u>or</u> (ii) the discharge does not result in a breach of the Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC) 2000 at the level of protection set in those guidelines for 80% of species, except for benzene where the level of protection is 90% of species (i.e. 1 milligram per litre), at the nearest of: (1) 50 metres; (2) the landholding boundary; (3) any point immediately adjacent to a surface waterbody, artificial watercourse, or water abstraction bore (excluding monitoring bores); from the discharge; and (iii) the discharge does not result in a breach of the Drinking Water Standards for New Zealand 2005 (Revised 2008) in any bore utilised for potable supply, except where the ambient water quality naturally breaches those Standards and the discharge does not result in any further degradation of the water quality.  (b) The discharge of soil from land contaminated by a hazardous substance onto or into land in circumstances which may result in those contaminants entering water is a permitted activity provided: (i) the hazardous substance in the soil results from the application of a fertiliser or agrichemical to the land authorised by a rule in this Plan or a resource consent; or (ii) the soil is being returned to the excavation or site from which it was taken.  (c) The discharge of contaminants or soil from land contaminated by a hazardous substance onto or into land in circumstances which may result in those contaminants entering water that



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>does not meet one or more of the conditions of Rule 46(a) or (b) is a discretionary activity.</p> <p><del>(d)</del> <u>Rule X – Site Investigations</u></p> <p>The use of land for a site investigation to assess concentrations of hazardous substances that may be present in the soil is a permitted activity provided the following conditions are met:</p> <p>(i) The site investigation is to be undertaken in accordance with Contaminated Land Management Guidelines No. 5: Site Investigation and Analysis of Soils (Ministry for the Environment, 2011) and reported on in accordance with the Contaminated Land Management Guidelines No. 1: Reporting on Contaminated Sites in New Zealand, (Ministry for the Environment, 2011); and</p> <p>(ii) The person or organisation initiating the site investigation provides a copy of the report of the site investigation to Environment Southland within two months of the completion of the investigation.</p> <p><del>(e)</del> The use of land for a site investigation to assess concentrations of hazardous substances that may be present in the soil that does not meet one or more of the conditions in Rule <del>X46(d)</del> is a discretionary activity.</p>
381.26	HOLDER Wendy & Tom	Rule 46		Rule 46(c) should be non-complying to protect water health.

#### Rule 47 – Closed landfills

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.93	Forest & Bird NZ	Rule 47	Support	Retain.
381.27	HOLDER Wendy & Tom	Rule 47		Rule 47(b) should be non-complying to protect water health.
411.34	Invercargill City Council	Rule 47	Support	Retain.
752.140	Southland Fish & Game Council	Rule 47	Support	Retain.
832.107	VAN GOOL Raewyn	Rule 47	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.59	WILSON Aaron	Rule 47	Oppose	Closed landfills which may result in those contaminants entering water should be consented as a non-complying activity
880.63	WILSON Shannon	Rule 47	Oppose	Closed landfills which may result in those contaminants entering water should be consented as a non-complying activity.

#### Rule 48 - Cemeteries

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.94	Forest & Bird NZ	Rule 48	Support	Retain.
752.141	Southland Fish & Game Council	Rule 48	Support	Retain.
750.21	Southland District Council	Rule 48	Amend	Consideration be given to amending the required depth to groundwater, and clarity be provided around the expectations of the consenting process.
832.108	VAN GOOL Raewyn	Rule 48	Support	Retain.

#### Taking and using water (note)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
288.32	Fulton Hogan Ltd & Southern Aggregates Ltd	Taking and using water	Support in part	Delete and insert in Statutory section.

#### Rule 49 – Abstraction, diversion and use of surface water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.42	Alliance Group Ltd	Rule 49	Oppose	Insert a new ambit to Rule 49 providing that the non-consumptive taking and use of surface water (outside the Waiau catchment) relating to an existing permit is a restricted discretionary activity.
24.106	Aratiatia Livestock Ltd	Rule 49	Support	Retain.
47.21	Balfour, Wendonside & Waikaia Group	Rule 49	Oppose	That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.  Include a reference to Appendix O in Rule 49.
97.4	Brunel Peaks Ltd	Rule 49	Amend	Ensure this is sufficient for enabling current stock, domestic and other farming water use.
99.9	BUCKINGHAM Greta	Rule 49	Oppose	We should out of decency and appreciation for our efforts be allowed 5% of our annual rainfall in return for handing on the other 95% as opposed to 40m3.
101.9	BUCKINGHAM Thomas	Rule 49	Oppose	Increase the consent requirement for abstraction being limited to 40m3 a day.
114.7	CALLAHAN Pamela	Rule 49	Oppose	This is only a tax on our operation.
118.9	Carmyllie Farm	Rule 49	Neutral	I think that works but has to be looked at year to year.
120.5	CARTER D G & B J	Rule 49(a)(ii)	Support	Retain.
133.9	Civil Tech Ltd	Rule 49(a)	Support	Retain.
156.11	COCKBURN Grant & Rachel	Rule 49	Amend	Insert a basic clause 'to allow sufficient surface water for stock drinking requirements'.
189.42	Dairy Holdings Ltd	Rule 49		<p>Either amend Rule 49(a)(i):  <del>the volume of take does not exceed 2000 litres per day, plus water taken for domestic and animal drinking water needs under s14(3)(b) of the Resource Management Act 1991, plus 250 litres per hectare per day, up to a maximum of 40 cubic metres per landholding per day, or per facility per day on or for public conservation land managed as such under the National Parks Act 1980, Conservation Act 1987, or the Reserves Act 1977, plus 250 litres per facility per day, up to a maximum of 40 cubic metres per facility per day.</del></p> <p>Alternatively, amend Rule 49(a)(i):  <del>the volume of take does not exceed 2000 litres per day, up to a maximum of 40 cubic metres per landholding per day plus 250 litres per hectare per day (to represent reasonable domestic and animal drinking water needs under s14(3)(b) of the RMA), or per facility per day on public</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>conservation land managed as such under the National Parks Act 1980, Conservation Act 1987, or the Reserves Act 1977</p> <p>And amend Rule 49(a)(ii) as follows:  the maximum volume of take allowed under this rule and Rule 54(a) is not added. A maximum of 86 cubic metres, <u>plus water taken under s 14(3)(b) of the RMA</u>, of groundwater and surface water combined per landholding per day may be taken</p>
192.15	DALE P T & S B Trust	Rule 49	Support	Drop the consent required for an aquifer pump test. This should be on a case by case basis in conjunction with purpose. Requiring a consent for aquifer pump test purposes in our view was a waste of resourcing.
208.5	DILLON M J & S E	Rule 49	Oppose	Exclude stock drinking water and domestic water use from Rule 49.
233.19	DYSON Valerie & Glyn	Rule 49	Support	Retain.
247.14	Environment Southland	Rule 49	Amend	<p>Amend Rule 49 as follows:</p> <p><u>Rule 49 – Abstraction, diversion and use of surface water</u></p> <p>(a) The take and use of surface water is a permitted activity provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) the volume of take does not exceed 2000 litres per day, plus 250 litres per hectare per day, up to a maximum of 40 cubic metres per landholding per day, or per facility per day on public conservation land managed as such under the National Parks Act 1980, Conservation Act 1987, or the Reserves Act 1977;</li> <li>(ii) the maximum volume of take allowed under this rule and Rule 54(a) is not added. A maximum of 86 cubic metres of groundwater and surface water combined per landholding per day may be taken, <u>including any water taken pursuant to s14(3)(b) of the RMA</u>;</li> <li>(iii) the volume of take does not exceed 30 percent of the naturalised instantaneous flow in the surface waterbody at the time of take;</li> <li>(iv) the rate of take does not exceed 2 litres per second;</li> <li>(v) fish are prevented from entering the reticulation system; and</li> <li>(vi) the following details are supplied to Environment Southland upon request: <ul style="list-style-type: none"> <li>(1) farming type;</li> <li>(2) stocking rate;</li> <li>(3) point of abstraction;</li> </ul> </li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(4) what the water was used for; and</p> <p>(5) maximum rate of take.</p> <p><u>(vii) where the volume of take exceeds 2000 litres per day, a water meter capable of recording the rate of take, and maximum daily volume of take shall be installed. The water take data shall be recorded daily and that data shall be provided to the Southland Regional Council on request. The water meter shall be verified every 12 months.</u></p> <p>...</p> <p><u>d) Despite Rule 49(c), the taking, diversion and use of water, where the application is for the replacement of an expiring water permit pursuant to Section 124 of the Act, and the rate of take and volume is not increasing, and use of the water is not changing, is a discretionary activity.</u></p> <p><del>(de)</del> Except as provided for in Rules 49(a), 49(b), 49(c), <del>49(d)</del>, 50(a), 50(b), 51(a), 51(b), and 51(c), the taking, diversion and use of water is a non-complying activity.</p> <p><del>(ef)</del> Despite Rules 49(b), 49(c), <del>and 49(d)</del>, <del>and 49(e)</del> the taking, diversion and use of water from the Cromel Stream, unless the application is for the replacement of an expiring water permit pursuant to Section 124 of the Act, and the rate of take and volume is not increasing, and use of the water is not changing, is a prohibited activity.</p>
250.6	ESLER Lloyd	Rule 49	Support	Retain.
259.17	F D Enterprises Ltd	Rule 49	Oppose	<p>That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.</p> <p>Include a reference to Appendix O in Rule 49.</p>
264.12	FarmRight Ltd	Rule 49	Oppose	Clarify that the permitted volumes for surface water abstraction are in addition to those volumes provided for under section 14 of the RMA. Include a reference to Appendix O in Rule 49.
265.100	Federated Farmers of NZ (Southland Province)	Rule 49	Support in part	<p>Amend Rule 49 by:</p> <p>Amending condition (a)(ii) to read: <u>“the maximum take allowed under both this rule and Rule 51 shall not exceed 86 cubic metres for both groundwater and surface water individually and combined per landholding per day.”</u></p> <p>Delete conditions (a)(vi) (1) and (2).</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Add a new condition to the end of the rule which reads:</p> <p><u>‘This rule shall not prevent people taking water to meet the requirements for an individual’s reasonable domestic needs or the reasonable needs of an individual’s animals for drinking water, in accordance with s14(3)(b) of the RMA.’</u></p>
279.95	Forest & Bird NZ	Rule 49	Support with minor amendments	<p>Amend Rule 49 as follows:</p> <p>7. methods to prevent fish from entering the reticulation system, <u>as set out in Appendix.....Adopt the ECAN Schedule.</u></p> <p>“10. The degree of hydraulic connection to groundwater <u>and other surface waterbodies and coastal lagoons and estuaries.</u></p> <p>11. Any effect on a <del>regionally</del> natural wetland”</p>
288.33	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 49	Oppose	<p>Amend Rule 49 to increase the permitted maximum rate of take to 5l/s and to extend the daily volume to 100 cubic metres per day for temporary construction related activities and add a new clause to Rule 49 to provide for temporary non-consumptive diversions as a controlled activity without requiring compliance with allocation limits.</p> <p>Rule 49 – Abstraction, diversion and use of surface water</p> <p>(a) The take and use of surface water is a permitted activity provided the following conditions are met:</p> <p>(i) the volume of take does not exceed 2000 litres per day, plus 250 litres per hectare per day, up to a maximum of 40 cubic metres per landholding per day, or per facility per day on public conservation land managed as such under the National Parks Act 1980, Conservation Act 1987, or the Reserves Act 1977;</p> <p><u>(ii) the volume of take associated with construction activities of less than 6 months duration does not exceed 100 cubic metres per day</u></p> <p><del>(iii)</del> the maximum volume of take allowed under this rule and Rule 54(a) is not added. A maximum of 86 cubic metres of groundwater and surface water combined per landholding per day may be taken;</p> <p><del>(iiiiv)</del> the volume of take does not exceed 30 percent of the naturalised instantaneous flow in the surface waterbody at the time of take;</p> <p><del>(ivv)</del> the rate of take does not exceed <u>25</u> litres per second;</p> <p><del>(vvi)</del> fish are prevented from entering the reticulation system; and</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(vii) the following details are supplied to Environment Southland upon request:</p> <ol style="list-style-type: none"> <li>(1) farming type;</li> <li>(2) stocking rate;</li> <li>(3) point of abstraction;</li> <li>(4) what the water was used for; and</li> <li>(5) maximum rate of take.</li> </ol> <p>[...]</p> <p><u>(X) Except as provided for in Rules 49(a), 50(a), 50(b), 51(a) and 51(b), the taking, diversion and use of water for temporary diversions for the purposes of construction from any of the following sources is a controlled activity</u></p> <p><u>(i) any surface waterbody or artificial watercourse where the total volume of water taken or diverted is returned within 100 metres of the take or diversion point; or</u></p> <p><u>(ii) any surface waterbody or artificial watercourse where the total volume of water taken is less than 70 cubic metres per day</u></p> <p><u>Environment Southland will restrict its control to the following matters:</u></p> <ol style="list-style-type: none"> <li><u>1. the volume, rate, frequency and timing of water to be taken (including any water to be returned to the surface waterbody and the delay between the taking and returning of this water);</u></li> <li><u>2. any effects on aquatic ecosystems and the availability and reliability of supply for existing users and water quality;</u></li> <li><u>3. the location of the take or diversion;</u></li> <li><u>4. consistency with any water conservation order;</u></li> <li><u>5. any effect on a regionally significant wetland</u></li> </ol>
313.10	GILLESPIE Maria	Rule 49	Amend	That the permitted maximum amount from surface water be set between 70 and 86 cubic metres per day.
350.2	HAMILTON Nick	Rule 49	Oppose	We ask that the wording is changed to reflect that this policy is for all <u>new</u> applications to take water. Delete 49 (e) and treat the Cromel the same as the other rivers and streams in Southland. If not then I think it is only fair to explain why not, and have the appropriate scientific data in support.
365.8	HEENAN M D and D W	Rule 49	Amend	Amend rule to be easier to understand, to reference stock drinking water, and address how a landholder can comply with this rule.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
368.6	HENDERSON Chris (Mrs)	Rule 49		Including the Cromel Stream in the Plan as an over-allocated water-body resulting in no new water consents being granted, is a pleasing development. There is a need to be reassured, however, that there is a determination by Environment Southland to re-consent all the water allocations on this, and other over-allocated water-bodies.
390.32	Horticulture NZ	Rule 49	Support in part	Clarify why consent is required for takes less than 70 cubic metres per day or amend to stipulate an amount over which resource consent is required.
414.9	Irrigation NZ Incorporated	Rule 49		<p><u>New Rule 49 (ba)</u>  <u>Except as provided for in Rules 49(a), 50(a), 50(b), and 51(a), 51(b) and 51(c), the replacement of existing resource consents is a restricted discretionary activity.</u>  <u>Environment Southland will restrict its discretion to the following matters:</u></p> <ul style="list-style-type: none"> <li>• <u>The rate, volume and timing of the take;</u></li> <li>• <u>The reasonable need for the quantities of water sought;</u></li> <li>• <u>Duration of consent;</u></li> <li>• <u>Lapsing of consent;</u></li> <li>• <u>Review of consent conditions;</u></li> <li>• <u>The collection, recording, monitoring and provision of information.</u></li> </ul> <p><u>For surface takes</u></p> <ul style="list-style-type: none"> <li>• <u>The effects of any intake structure on fish passage and the need for fish exclusion devices or screens</u></li> </ul>
438.6	KENNEDY John	Rule 49	Oppose	This is particularly overbearing and complicates the taking of water on an as of right basis around stock water. The taking of water for stock and household use must be free of complex numbers, metering and reporting requirements.
449.22	KiwiRail Holdings Ltd (KiwiRail)	Rule 49	Support	Retain.
464.24	Landpro Ltd	Rule 49	Support in part	That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA. Include a reference to Appendix O in Rule 49. We seek justification for why surface water takes are to be prohibited from the Cromel Stream. We propose that the rule be amended to include non-consumptive takes as permitted activities.
470.4	LIETZE Janet & David	Rule 49(a)	Oppose	No restriction for water taken for watering stock.
479.5	Lowburn Ag Ltd (Birgit Pemberton)	Rule 49(a)(ii)	Oppose	Keep water takes as a consented activity.
480.8	Lowburn Ag Ltd	Rule 49(a)(ii)	Oppose	Keep water takes as a consented activity.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Jonathan Pemberton)			
502.9	MARSHALL Allan & Kathryn	Rule 49	Oppose	Amend to allow allocation of 5% of our annual rainfall.
507.9	MARSHALL Spencer	Rule 49	Oppose	Be allowed 5% of our annual rainfall in return for handing on the other 95%.
556.11	MCRAE Joe	Rule 49	Amend	Increase maximum water take to 60 cubic metres.
557.10	MCRAE Matt	Rule 49	Amend	Increase maximum water take to 60 cubic metres.
569.12	MILLER R J Trust	Rule 49	Oppose	Reference to Appendix O in surface water and groundwater abstraction rules.
590.15	Mt Linton Station	Rule 49	Oppose	It would be recommended that caps were based on the size and scale of properties.
603.13	Nithdale Station	Rule 49		I propose that all existing water takes that have current consents remain as they are.  Amend so that water abstraction be on a per ha basis rather than a landholding basis and would take into account at a minimum, all requirements for stock water and that this would be a permitted activity.
604.10	Nokomai Station Ltd	Rule 49	Oppose	Clarify that permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.
611.10	NZ Defence Force	Rule 49	Amend	Insert a new permitted activity rule as follows:  <u>“The short-term taking and use of surface water for temporary water supply during temporary military training activities on portable water treatment plants at rates of less than 16.7 litres/second to a maximum of 210 m3 per day.”</u>  And the following permitted activity standards:  (a) <u>“The intake shall be fitted with a screen mesh with aperture not exceeding 1 mm in diameter.</u> (b) <u>The intake velocity through the intake screen shall not exceed 0.12 metres/second.</u> (c) <u>The Consent Authority shall be notified no less than 10 working days prior to the activity commencing, including the dates the activity will be undertaken, abstraction location, duration and maximum daily rate and volume of the water take.”</u>
612.3	NZ Fire Service Commission	Rule 49	Amend	Amend Rule 49 as follows by adding: (a) The take, <u>diversion</u> and use of surface water is a

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				permitted activity provided the following conditions are met: (i) .... (ii) .... (iii) .... (iv) .... (v) .... (vi) .... (vii) <u>The take and use is required for fire-fighting emergency response and / or training activities (regardless of (i) to (vi) above).</u>
640.48	Pourakino Catchment Group	Rule 49	Support	Retain.
646.8	Progress Valley Farms Ltd	Rule 49	Oppose	It is an absolute insult that we are expected to pass on 12740000m <sup>3</sup> of water per year in pristine condition but yet we are only allowed a pitiful 14600m <sup>3</sup> per year for ourselves. 0.1%. The consent required for over 40m <sup>3</sup> a day is clearly another large operator tax as this flat rate limit is less than half our daily stock water requirement. We should out of decency and appreciation for our efforts be allowed 5% of our annual rainfall in return for handing on the other 95%.
647.13	Progressive Engineering Southland Ltd	Rule 49	Oppose in part	Regulation of water takes for dairy activity as a controlled activity.  Amend rule 49 as per the Operative Water Plan for Southland.
666.23	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 49	Amend	Relate the maximum limit to landholding area.
681.17	Rockytommy Farming Ltd	Rule 49	Oppose	Amend so that permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.  Include a reference to Appendix O in Rule 49.
682.13	Rokenwai Farming Ltd	Rule 49	Oppose	Amend so that permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Include a reference to Appendix O in Rule 49.
708.3	Scandrett Rural Ltd	Rule 49	Amend	Section 14(3) of the Resource Management Act was included in the previous plan. It should also be included in the new plan.
730.10	SMALLEY Timothy	Rule 49	Oppose	We want to keep our consented water rights, not just be allocated amount.
731.9	SMITH Barry	Rule 49		Change (a) (iv) to 5 Ltrs/sec.
748.8	Southern View Ltd	Rule 49	Support	Retain.
750.22	Southland District Council	Rule 49		The taking of water for the construction of a road be exempt from the overall quantity of water take per landholding, and the rate of take be increased from 2 to 5 litres per second.
752.142	Southland Fish & Game Council	Rule 49	Support in part	Retain Rule 49 as notified and amend Rule 49(b)(3) and (10) – (11) to provide: <b><u>“Environment Southland will exercise its discretion to the following matters:</u></b> ... 3. Any effects on river and stream flows (including effects on minimum flows, flow variability and duration of flows), wetland and lake water levels, aquatic ecosystems, aquifer storage volumes, the availability and reliability of supply for existing users, <del>and</del> water quality <u>and recreational values;</u> ... “10. The degree of hydraulic connection to groundwater <u>and other surface waterbodies.</u>  <u>11. Any effect on a regionally natural wetland”</u> Insert a Schedule entitled <b><u>“Fish Screening Standards and Requirements”</u></b> that matches the Fish Screen Standards and Guidelines set out in the Canterbury Land and Water Plan. Attached and marked <b>Appendix 3</b> is a copy of the the Fish Screen Standards and Guidelines set out in the Canterbury Land and Water Plan.
759.20	Springlands Group Ltd	Rule 49	Oppose	That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA. Include a reference to Appendix O in Rule 49.
783.5	STRINGER Joe	Rule 49	Support	Retain – please add in an exclusion for contained catchment from roofs.
805.1	The Roding Company Ltd	Rule 49	Amend	Increase the daily allowed volume of water extraction from streams, lakes and rivers to 100 cubic metres at an allowable uptake rate of 5 litres per second for the purposes of road

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				construction by reputable contractors.
810.47	Three Rivers Catchment Group (TRCG)	Rule 49	Support	Retain.
828.7	Twin Farm Ltd	Rule 49	Oppose	Exclude stock drinking water and domestic water use from the total allocation.
831.5	VAN DER BIJL Willem	Rule 49	Oppose	Taking of water for stock and cowshed should be a permitted activity.
832.109	VAN GOOL Raewyn	Rule 49	Support	Retain.
850.1	WaterForce Southland	Rule 49	Amend	A review of the Quantities and Science on how this rule works practically is needed to manage this resource.
879.6	WILSON Kerry	Rule 49	Oppose	Keep with consents and monitoring, leave it as it is.

### Rule 50 – Community water supply

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.43	Alliance Group Ltd	Rule 50	Oppose in part	Amend the rule as follows: (a) Existing Community Water Supply <u>and Priority Takes</u> (i) Notwithstanding Rule 49 ..., the taking and use of water for a community water supply <u>or other priority water take</u> is a controlled activity provided...
279.96	Forest & Bird NZ	Rule 50	Support with minor amendments	Add the following to the list of matters ES will consider: <ul style="list-style-type: none"> <li>• <u>The location of the take or diversion;</u></li> <li>• <u>Methods to prevent fish from entering the reticulation system;</u></li> </ul> <u>Any effect on a natural wetland or habitat of significant indigenous species</u>
390.33	Horticulture NZ	Rule 50	Support in part	Include additional matter of control in Rule 50: <u>Management of water shortages.</u>
623.5	P H Bennett Ltd	Rule 50	Oppose	I would like to see town houses have water tanks to catch water off their roofs to use for things like household use and gardens. Most rural farmers try to make the best use of the water that comes out of the sky, so should our towns.
664.23	Real Journeys Ltd	Rule 50		Provide for water abstraction for intermediate size activities. That is activities between households and community water supplies.
725.7	Silver Fern Farms Ltd	Rule 50	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.143	Southland Fish & Game Council	Rule 50		Retain Rule 50 as notified and amend Rule 50(a) to provide: “... Environment Southland will exercise its control over the following matters: ... 3. Any effects on river and stream flows (including effects on minimum flows, flow variability and duration <u>of flows</u> ), wetland and lake water levels, aquatic ecosystems, aquifer storage volumes <u>and recreational values</u> ;  Insert the following matters that Environment Southland will exercise its control over: <u>9. The location of the take or diversion</u> ; <u>10. Methods to prevent fish from entering the reticulation system</u> ; <u>11. Any effect on a natural wetland</u> ; <u>12. The efficiency of water use</u> ”
832.110	VAN GOOL Raewyn	Rule 50	Support	Retain.

### Rule 51 – Minor diversions of water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.86	BYTHELL Jesse	Rule 51	Support in part Amend	I strongly support Rule 51. However, I seek the addition of the following clause in 51 (a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
233.20	DYSON Valerie &Glyn	Rule 51	Support	Retain.
247.15	Environment Southland	Rule 51	Amend	Amend Rule 51(b) to read: (b) Despite any other rule in this Plan, the diversion of water for the purpose of land drainage is a permitted activity provided the following conditions are met: (i) the <del>diversion drainage</del> and associated discharge does not cause erosion or deposition; (ii) the <del>diversion drainage</del> shall not cause flooding of downstream or adjacent properties;...
279.97	Forest & Bird NZ	Rule 51	Support with	Amend to ensure that minor diversions of water from all wetlands including listed Regionally

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			minor amendment	Significant Wetlands are prohibited.
288.34	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 51	Support in part	<p>Amend Rule 51 to extend the 1 month timeframe and to add an additional clause addressing temporary diversion activities for purposes other than land drainage:</p> <p>Rule 51 – Minor diversions of water</p> <p>(a) Despite any other rule in this Plan, the diversion of water within a river or lake bed is a permitted activity provided the following conditions are met:</p> <p>[...]</p> <p>(iii) the water is returned to its original course after completion of the activity, no later than <del>one</del><u>six</u> months after the diversion occurs;</p> <p>[...]</p> <p><u>(e) Unless controlled by any other rule in this Plan, the diversion of water for the purpose of construction activities that does not meet Rule 51(a) to (c) is a discretionary activity.</u></p>
372.14	Heritage NZ	Rule 51	Support in part	<p>Retain Rule 51(a)(i)(7).</p> <p>Amend Rule 51(c)(iii)(6) as follows:</p> <p>(6) in the event of a discovery, or suspected discovery, of a site of cultural, heritage or archaeological value, the operation shall cease immediately in that location and the Director of Policy, Planning and Regulatory Services, Environment Southland shall be informed. Operations may recommence with the permission of the Director of Policy, Planning and Regulatory Services <u>who will consult with Heritage New Zealand Pouhere Taonga.</u></p> <p><u>Advice note: Due to the high concentration of recorded archaeological sites in the vicinity of the above sites, it is possible that works will require an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014. No work (even by resource consent) should commence without first contacting Heritage New Zealand.</u></p>
449.23	KiwiRail Holdings Ltd (KiwiRail)	Rule 51	Support in part	<p>Rule 51(a)(i)(3) - Retain in relation to activities in the water being kept to a minimum.</p> <p>Rule 51(a)(i)(4) - Retain that any bed disturbance is the minimum required to undertake the activity and that there is a practical element associated with reinstatement;</p> <p>Rule 51(a)(ii) - Retain in relation to diversion being within the watercourse; and</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Rule 51(a)(iii) - Retain that there is a one month duration on the temporary diversion.</p> <p>Amend as follows:  Rule 51 – Minor diversions of water  (a) Despite any other rule in this Plan, the diversion of water within a river or lake bed is a permitted activity provided the following conditions are met:  (i) the diversion is for the purposes of undertaking a permitted activity under Rules 55 to 79 or for the purposes of habitat creation, restoration and enhancement, hydrologic research and is carried out in accordance with the following conditions: ...  (6) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;  <del>(7) there are no recorded historic heritage sites, at the site of the activity;</del>  (8) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993; ...</p>
523.8	MCGREGOR Grant	Rule 51	Support Amend	(iii) the water is returned to its original course after completion of the activity, no later than one month after the diversion occurs, <u>excluding works undertaken for soil conservation and river control purposes.</u>
614.22	NZ Transport Agency	Rule 51	Support Amend	... (10) from the beginning of November until the end of May, there shall be no Disturbance of the tidal river habitat up to the spring tide level; <u>(11) diversions in the vicinity of a network utility not to compromise that network utility.</u>
697.12	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 51	Support	Retain.
752.144	Southland Fish & Game Council	Rule 51	Support Amend	<p>Retain Rule 51 as notified and amend Rule 51(d) to provide:  (d) Unless controlled by another rule in this Plan, the diversion of water for the purpose of land drainage that does not meet Rule 51(a) <del>to</del> <u>and</u>(c) is a discretionary activity.</p> <p>Insert new Rule:  <u>(e) The diversion of water for the purposes of land drainage that does not meet Rule 51(b)(iii) is a non-complying activity.</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Alternatively, insert a footnote to Rule 51(d) providing as follows: <u>“The diversion of water from a regionally significant wetland or naturally occurring wetland for land drainage purposes is a non-complying activity under Rule 74(c) of the Plan.”</u>
753.7	Southland River Liaison Committees	Rule 51	Support Amend	(iii)the water is returned to its original course after completion of the activity, no later than one month after the diversion occurs, <u>excluding works undertaken for soil conservation and river control purposes.</u>
832.111	VAN GOOL Raewyn	Rule 51	Support	Retain.
877.60	WILSON Aaron	Rule 51	Support	Retain.
880.64	WILSON Shannon	Rule 51	Support	Retain.

#### Rule 52 – Water abstraction, damming, diversion and use from the Waiau catchment

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
156.12	COCKBURN Grant & Rachel	Rule 52	Oppose	Provide for a pathway for community involvement and discussion regarding a community allocation of a comparatively minor amount of surface water.
233.21	DYSON Valerie &Glyn	Rule 52	Support	Retain.
246.5	ENGLISH Hamish	Rule 52	Oppose	Make available an allocation that recognizes the national interest of Meridian's 550 cumecs take but also ongoing local development opportunities be it irrigation or any other use outside of limited stock water. An allocation of 11 cumecs. Allow the opportunity for water storage.
247.16	Environment Southland	Rule 52	Amend	Remove reference to Rule 51(c) from Rule 52(b).
279.98	Forest & Bird NZ	Rule 52	Support with minor amendment	Delete 52 (a) and amend 52(b) <del>(b)(a)</del> Except as provided in Rules 49(a), 49(b), 49(c), 51(a), 51(b) and 51(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment <del>that does not meet the condition of Rule 52(a)</del> is a non-complying activity.
330.17	Gore District Council,	Rule 52	Oppose	Amend Rule 52 as follows:



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Invercargill City Council and Southland District Council		Amend	<p><b>Rule 52 – Water abstraction, damming, diversion and use from the Waiau catchment</b></p> <p>a. Except as provided in Rules 49(a), 49(b), 49(c), <u>50(a) and (b)</u>, 51(a), 51(b) and 51(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment is a discretionary activity provided the following condition is met:</p> <p>i. the application is for the replacement of an expiring water permit pursuant to Section 124 of the Act, and the rate of take and volume is not increasing, and use of the water is not changing.</p> <p>Except as provided in Rules 49(a), 49(b), 49(c), <u>50(a) and (b)</u>, 51(a), 51(b) and 51(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment that does not meet the condition of Rule 52(a) is a non-complying activity.</p>
464.25	Landpro Ltd	Rule 52	Support Amend	Clarity of the Rule is sought particularly in terms of the stream depletion assessment.
516.4	MCDONALD Cameron	Rule 52	Oppose	Free up consents for irrigation [see submission for detail].
562.14	Meridian Energy Ltd	Rule 52	Oppose in part	<p><b>Amend Rule 52 to read:</b></p> <p>Rule 52 – Water abstraction, damming, diversion and use from the Waiau catchment</p> <p>(a) Except as provided in Rules 49(a), 49 (b), 49 (c), 51 (a), 51 (b) <del>and</del> 51 (c) , <u>52A and 52B</u> and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment is a discretionary activity provided the following conditions are met:</p> <p>(i) the application is for the replacement of an expiring water permit pursuant to section 124 of the Act, and the rate of take and volume, and use of the water is not changing</p> <p>(b) Except as provided in Rules 46(a), 46(b), 46(c), 47(a), 47(b) and 47(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment that does not meet the condition of Rule 49(a) is a non-complying activity.</p>
569.13	MILLER R J Trust	Rule 52	Oppose	Reference to Appendix O in surface water and groundwater abstraction rules.
611.11	NZ Defence Force	Rule 52	Support in part	Include an exemption in Rule 52(a) to the additional rule above [see Rule 49] on short-term taking and use of surface water for temporary military training activities.
697.13	Rural Contractors of NZ	Rule 52	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Incorporated (Linda Stalker)			
752.145	Southland Fish & Game Council	Rule 52	Oppose	<p>Amend Rule 52 as follows:</p> <p><b>Rule 52 – Water abstraction, damming, diversion and use from the Waiau catchment</b></p> <p><del>(a) Except as provided in Rules 49(a), 49(b), 49(c), 51(a), 51(b) and 51(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment is a discretionary activity provided the following condition is met:</del></p> <p><del>(i) the application is for the replacement of an expiring water permit pursuant to Section 124 of the Act, and the rate of take and volume is not increasing, and use of the water is not changing.</del></p> <p><del>(b)(a) Except as provided in Rules 49(a), 49(b), 49(c), 51(a), 51(b) and 51(c) and the takes authorised by Section 14(3) of the Act, any take, damming, diversion and use of water from the Waiau catchment that does not meet the condition of Rule 52(a) is a non-complying activity.</del></p>
562.15	Meridian Energy Ltd	New Rule 52A – Water abstraction, damming, diversion, use and discharges from the Waiau catchment associated with the Manapouri Power Scheme		<p>Insert a new rule to read:</p> <p><u>Rule 52A</u></p> <p><u>Any take, damming, diversion and use of water and the discharge of contaminants or water into water or contaminant onto or into land in circumstances which may result in that contaminant entering water which is an activity that is part of the Manapouri Power Scheme, for which consent is held and is the subject of an application for a new consent of the same activity and:</u></p> <p>(a) <u>the use of water is for the generation of electricity from the Manapouri Power Scheme and includes the taking, damming, diverting or discharge of water; or</u></p> <p>(b) <u>the taking, diverting or discharge of water into the tailraces; or</u></p> <p>(c) <u>the taking, damming, diverting or discharge is to protect the structural integrity of control gates, tailraces and appurtenant structures or</u></p> <p>(d) <u>the discharge is of generation and spill water for generation and control structures is a controlled activity provided the following conditions are met:</u></p> <p>(i) <u>in relation to any water permits the application is for the replacement of an expiring water permit pursuant to section 124 of the Act; and</u></p> <p>(ii) <u>the rate of take and volume, and use of the water is the same as the maximum or</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>minimum levels or flow or rate of use as set out in any relevant operative rules of this regional plan; and</u></p> <p>(iii) <u>in relation to any discharge permits the discharge does not cause the relevant water quality standards to be exceeded as set out in any relevant operative rules of this regional plan.</u></p> <p><u>The matters over which control is reserved are:</u></p> <p>(a) <u>any mitigation measures to address adverse effects, except for changes or alterations to</u></p> <p>(i) <u>maximum or minimum levels or flow or rate of use as set out in any relevant operative rules of this regional plan</u></p> <p>(ii) <u>the water quality standards as set out in any relevant operative rules of this regional plan</u></p> <p>(b) <u>Collection, recording, monitoring and provision of information concerning the exercise of consent, and</u></p> <p>(c) <u>lapse period, duration of consent and review requirements.</u></p> <p>(d) <u>Measures necessary to ensure any discharge is not the cause of any water quality standards being exceeded than otherwise provided for in the relevant operative regional plan.</u></p> <p><u>Any application made under Rule 52A will be publicly notified.</u></p> <p><u>Rule 52B</u></p> <p><u>Any take, damming, diversion, use of water and the discharge of contaminants or water onto or into land in circumstances where contaminants may enter water, or into surface water, which is an activity that is part of the Manapouri Power Scheme, for which a consent is held and is the subject of an application for a new consent for the same activity that does not meet the condition of Rule 52A is a discretionary activity.</u></p>
832.112	VAN GOOL Raewyn	Rule 52	Support	Retain.
871.5	WILLANS Murray & Tarn	Rule 52	Oppose	Provide for a pathway for community involvement and discussion regarding a community allocation of a comparatively minor amount of surface water.

### Rule 53 – Bores and wells

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.107	Aratiatia Livestock Ltd	Rule 53	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.87	Director-General of Conservation	Rule 53	Support in part	Delete the following note: <del>An application for resource consent under Rule 53(a) will be processed and considered without public or limited notification unless the applicant requests notification or Environment Southland considers special circumstances exist that warrant notification of the application.</del>
233.22	DYSON Valerie &Glyn	Rule 53	Support	Retain.
258.19	Eyre Creek Ltd	Rule 53	Support	Retain this rule assuming it hasn't changed from the previous regulation.
372.15	Heritage NZ	Rule 53	Support in part Amend	Retain Rule 53(a) Matter of discretion (1).
449.24	KiwiRail Holdings Ltd (KiwiRail)	Rule 53	Support	Retain.
464.26	Landpro Ltd	Rule 53	Amend	We seek the removal of 53(iii) from the PSWLP, and replace with something along the lines of recommending drinking water supply bores fully penetrate the source aquifer.
640.49	Pourakino Catchment Group	Rule 53	Support	Retain.
737.28	Smithill Ltd	Rule 53	Support	Retain.
752.146	Southland Fish & Game Council	Rule 53	Support	Retain.
810.48	Three Rivers Catchment Group (TRCG)	Rule 53	Support	Retain.
832.113	VAN GOOL Raewyn	Rule 53	Support	Retain.
868.25	Wilkins Farming Ltd	Rule 53	Support	Retain this rule assuming it hasn't changed from the previous regulation.
895.55	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 53	Support	Retain.

## Rule 54 – Abstraction and use of groundwater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
13.5	All In Ltd	Rule 54	Oppose	Delete Rule 54 and keep the current water take permit process.
24.108	Aratiatia Livestock Ltd	Rule 54	Support	Retain.
26.15	Ardoyne Farm Dairys	Rule 54		Delete.
47.22	Balfour, Wendonside & Waikaia Group	Rule 54	Oppose in part	That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA. Include a reference to Appendix O in Rule 54.
54.14	Bayswater Dairy Ltd	Rule 54	Oppose	Retain current water take process.
76.4	BLACKMORE Peter	Rule 54	Support	Change from 20,000 to 86,000.
77.4	BLACKMORE Richard Thomas	Rule 54	Support	Make change from 20,000 – 86,000.
78.5	BLACKMORE Warren	Rule 54	Support	Change from 20,000 to 86,000.
101.10	BUCKINGHAM Thomas	Rule 54	Oppose	We would like this rule removed as we live in a 1400mm rainfall area and the water would only be used for a stock water system for the farm.
118.10	Carmyllie Farm	Rule 54	Neutral	I think that works but has to be looked at year to year.
133.10	Civil Tech Ltd	Rule 54(a)	Support	Retain.
152.24	Clover Bell Ltd	Rule 54	Support	Retain.
189.43	Dairy Holdings Ltd	Rule 54		Amend Rule 54(a)(i)(1) as follows: a maximum of 86 cubic metres per day per landholding <u>plus water taken for domestic and stock drinking water purposes under s14(3)(b) RMA</u>  Amend Rule 54(a)(ii) as follows: the maximum volume of take allowed under this rule and Rule 50(a) is not added. A maximum of 86 cubic metres, <u>plus water taken under s 14(3)(b) of the RMA</u> , of groundwater and surface water combined per landholding per day is allowed
197.9	DEVINE Wade	Rule 54	Neutral	Any water taken for the purpose of commercial and financial gain except farming or community water supply must be subject to significant royalties for the public benefit of Southland and funds gained used to assist with infrastructure and or reduce rates.
209.39	DIPROSE Dave	Rule 54	Oppose	1) a maximum of <del>86 cubic metres</del> per day per landholding

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.88	Director-General of Conservation	Rule 54	Oppose in part	Amend Rule 54 (d) as follows: (d) Other than that provided by Rule 54(a), groundwater takes from groundwater management zones listed in Appendix L is a discretionary activity provided the following conditions are met: (i) the total groundwater allocation is within the primary or secondary allocation limits established in Appendix L.5; and (ii) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct or High, <u>Moderate</u> the relevant surface water minimum flows and allocation limits are met;
214.16	Donald Farms	Rule 54(a)(i)	Oppose	<u>Recommend</u> 500 litres per hectare per day regardless of landholding size.
233.23	DYSON Valerie &Glyn	Rule 54	Support	Retain.
247.17	Environment Southland	Rule 54	Amend	Amend Rule 54 as follows: <b>Rule 54 – Abstraction and use of groundwater</b> (a) The take and use of groundwater is a permitted activity provided the following conditions are met: (i) The rate and volume of abstraction does not exceed: (1) A maximum of 86 cubic metres per day per landholding; and (2) A maximum rate of 5 litres per second; and (3) The point of abstraction is not within 50 metres of an existing lawfully established groundwater take; (ii) The maximum volume of take allowed under this rule and Rule 50(a) is not added. A maximum of 86 cubic metres of groundwater and surface water combined per landholding per day is allowed; (iii) The following details are supplied to Environment Southland upon request: (1) Farming type; (2) Stocking rate; and (3) Point of abstraction. <u>Where the volume of the take exceeds 2000 litres per day, a water meter capable of recording the rate of take, and maximum daily volume of take shall be installed. The water take data shall be recorded daily and that data shall be provided to the Southland Regional Council on request. The water meter shall be verified every 12 months.</u> (b) The non-consumptive take and use of groundwater is a permitted activity provided the following conditions are met: (i) the rate and volume of take does not exceed:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(1) a maximum rate of 10 litres per second;</p> <p>(2) a maximum daily volume of 750 cubic metres;</p> <p><del>(3) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct or High, the relevant surface water minimum flows and allocation limits are met;</del></p> <p><del>(ii)</del>(4) any interference effects are “acceptable” in accordance with Appendix L.3;</p> <p><del>(iii)</del> the same amount of water is returned to the same waterbody or aquifer within 250 metres of the point at which it was taken;</p> <p><del>(iv)</del> there is no significant delay between the taking and returning of the water.</p> <p>...</p> <p>(d) Other than that provided for by Rule 54(a), <del>the take and use of groundwater takes from groundwater management zones</del> <u>aquifers listed in Appendix L.5</u> is a discretionary activity provided the following conditions are met:...</p> <p>...</p> <p>(f) Other than that provided by Rule 54(a), the take and use of groundwater outside groundwater management zones listed in Appendix L.5 is a discretionary activity provided the following conditions <u>are</u> <del>is</del> met;</p> <p><del>(i) the allocation is within the primary allocation limit established following the methodology outlined in Appendix L.7</del></p> <p><del>(ii)</del> any interference effects are ‘acceptable’ in accordance with Appendix L.3;</p>
250.7	ESLER Lloyd	Rule 54	Support	Retain.
258.20	Eyre Creek Ltd	Rule 54	Support	Retain this rule assuming it hasn’t changed from the previous regulation.
265.101	Federated Farmers of NZ (Southland Province)	Rule 54		<p>Delete conditions 54(a)(iii) (1) and (2).</p> <p>Add a new condition to the end rule 54(a) which reads:</p> <p><u>‘This rule shall not prevent people taking water to meet the requirements for an individual’s reasonable domestic needs or the reasonable needs of an individual’s animals for drinking water, in accordance with s14(3)(b) of the RMA.’</u></p>
269.2	Fernview Family Trust	Rule 54	Amend	Automate water meter data to council to ensure accuracy and expediency of take data.
277.54	Fonterra Co-operative Group Ltd	Rule 54	Oppose in part	<p>Replace clause (d)(iii) with the following:</p> <p><u>“(iii) any significant interference effects that impact on the use of adequately penetrating</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>bores are avoided, remedied or mitigated;”</u>
279.99	Forest & Bird NZ	Rule 54	Oppose	Amend Rule 54(c)(iv) to refer to the express requirements of s 70(1) of the RMA and include performance based standards to achieve the matters set out in s 70(1)(c) – (g).
288.35	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 54	Support	Retain.
339.14	GUNN Olivia	Rule 54	Oppose	We recommend that ES keep current water take permit process.
361.15	HBG AgriLimited	Rule 54	Support Oppose	Retain the current water take permit process.
376.1	Hippos Family Trust	Rule 54	Oppose	That ES keep current water take permit process.
386.14	Hopcroft Farms Ltd	Rule 54	Oppose	I recommend that ES keep current water take permit process.
390.34	Horticulture NZ	Rule 54	Support in part	Clarify how the definition of landholding will be applied in respect of ‘occupier’.
396.4	Hughes-Crowley Company Ltd	Rule 54	Oppose	We recommend that ES drop this suggested rule and keep the current water take permit process.
414.10	Irrigation NZ Incorporated	Rule 54		<p><u>New Rule 54 (ca)</u></p> <p><u>Other than that provided for by Rules 54(a) and 54(c), the replacement of existing resource consents is a restricted discretionary activity.</u></p> <p><u>Environment Southland will restrict its discretion to the following matters:</u></p> <ul style="list-style-type: none"> <li>• <u>The rate, volume and timing of the take;</u></li> <li>• <u>The reasonable need for the quantities of water sought;</u></li> <li>• <u>Duration of consent;</u></li> <li>• <u>Lapsing of consent;</u></li> <li>• <u>Review of consent conditions;</u></li> <li>• <u>The collection, recording, monitoring and provision of information.</u></li> </ul> <p><u>For groundwater takes:</u></p> <ul style="list-style-type: none"> <li>• <u>The effects the take (on its own, or in combination with other takes) has on any other authorised takes (including well interference drawdown effects);</u></li> </ul>
431.5	Kaikaha Farms Ltd	Rule 54	Oppose	We recommend that ES drop this suggested rule and keep the current water take permit process.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
438.7	KENNEDY John	Rule 54	Oppose	This is particularly overbearing and complicates the taking of water on an as of right basis around stock water. The taking of water for stock and household use must be free of complex numbers, metering and reporting requirements.
449.25	KiwiRail Holdings Ltd (KiwiRail)	Rule 54	Support	Retain.
451.12	Knockinnon Farm Trust	Rule 54	Oppose	Delete and retain, the current water permit process is fair and we recommend that it remain as it stands.
457.1	L & M Ashers Waituna Limited	Rule 54	Amend	Amend Rule 54: (i) Rule 54(b)(ii) be amended to take into account slight variances in the quantity of water returned to the same waterbody or aquifer to allow for losses through any groundwater take system (i.e. evaporation from ponds). (i) Rule 54(d) to (f) be amended to include Rule 54(b); i.e. the statement at the start of the rules should be: “Other than that provided by Rules 54(a) and 54(b)..”
464.27	Landpro Ltd	Rule 54	Oppose in part	That permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA. Retain 54(a) – (c). Include a reference to Appendix O in Rule 49. Further justification of the proposed allocation volumes is sought.
482.19	Lower Aparima Catchment Group	Rule 54	Oppose	We recommend that ES keep current water take permit process.
522.6	McFarm Trust - Pahia	Rule 54	Oppose	Keep current water take process.
561.3	MENLOVE William	Rule 54	Neutral	Process around pump test need to be tightened up to better reflect how an aquifer is being utilised. This is important to better protect the aquifers from over extraction and protect existing users capital investment in infrastructure. The description and level of understanding around “acceptable interference” needs to reflect the rights of existing users. Make the protocols around transfer of water rights more vigorous and give existing consent holders in the new area an opportunity to submit on the transfer.
562.16	Meridian Energy Ltd	Rule 54	Oppose in part	Amend Rule 54 (d) to read: (d) Other than that provided by Rule 54(a), <u>and groundwater takes from the Te Anau groundwater management zone having a moderate hydraulic connection with surface water</u> , groundwater takes from groundwater management zones listed in Appendix L is a discretionary activity provided the following conditions are met: (i) the total groundwater allocation is within the primary or secondary allocation limits established in Appendix L.5; and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>(ii) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct or High, the relevant surface water minimum flows and allocation limits are met;</li> <li>(iii) any interference effects are 'acceptable' in accordance with Appendix L.3;</li> <li>(iv) if the total groundwater allocation is within the secondary allocation limit, then minimum groundwater level cut-offs and seasonal recovery triggers are established in accordance with criteria outlined in Appendix L.6.</li> </ul> <p>Amend Rule 54 (g) to read:</p> <p>(d) The take and use of groundwater that does not comply with Rules 54(b) to 54(f) <u>or is a groundwater take from the Te Anau groundwater management zone having a moderate hydraulic connection with surface water</u> is a non-complying activity.</p>
564.15	Mid-Aparima Catchment Group	Rule 54	Oppose	We recommend that ES keep current water take permit process.
569.14	MILLER R J Trust	Rule 54	Oppose	Reference to Appendix O in surface water and groundwater abstraction rules.
603.14	Nithdale Station	Rule 54		<p>Amend so that water abstraction be on a per ha basis rather than a landholding basis and would take into account at a minimum, all requirements for stock water and that this would be a permitted activity.</p> <p>I propose that all existing water takes that have current consents remain as they are.</p>
612.4	NZ Fire Service Commission	Rule 54	Amend	<p>Amend Rule 54 as follows by adding:</p> <p><u>(g) The abstraction and use of groundwater for fire-fighting emergency response is a permitted activity. For clarity (a) to (f) above do not apply.</u></p>
681.18	Rockytommy Farming Ltd	Rule 54	Oppose in part	<p>Amend so that permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.</p> <p>Include a reference to Appendix O in Rule 54.</p>
682.14	Rokenwai Farming Ltd	Rule 54	Oppose in part	<p>Amend so that permitted volumes for surface water abstraction are in addition to those volumes provided for under Section 14 of the RMA.</p> <p>Include a reference to Appendix O in Rule 54.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
725.8	Silver Fern Farms Ltd	Rule 54	Support	Retain.
730.11	SMALLEY Timothy	Rule 54	Oppose	We want to keep our consented water rights, not just be allocated amount.
741.4	South Hughes Farms Ltd	Rule 54	Oppose	We recommend that ES drop this suggested rule and keep the current water take permit process.
748.9	Southern View Ltd	Rule 54	Support	Retain.
752.147	Southland Fish & Game Council	Rule 54	Support Amend	<p>Amend Rule 54(a)(iii) to include the following additional bullet points:  <u>(4) What the water was used for; and</u>  <u>(5) Maximum rate of take.</u></p> <p>Amend Rule 54(c)(iv) to refer to the express requirements of s 70(1) of the RMA and include performance based standards to achieve the matters set out in s 70(1)(c) – (g).</p> <p>Amend Rule 54(d)(ii) to provide:  “(ii) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct, <del>or</del> High, <u>or moderate</u>, the relevant surface water minimum flows and allocation limits are met;</p>
761.15	STALKER Hanna & Callum	Rule 54	Oppose	We recommend that ES keep current water take permit process.
765.5	Stenkoll Farms Ltd	Rule 54	Oppose	We recommend that ES drop this suggested rule and keep the current water take permit process.
773.8	STEWART Rory	Rule 54	Support	Retain.
782.4	STRINGER Joe	Rule 54	Support	Retain – please add in an exclusion for contained catchment from roofs.
798.9	TEMPLETON Luke	Rule 54	Oppose	I recommend that ES keep current water take permit process.
799.10	TEMPLETON Peter	Rule 54	Oppose	I recommend that ES keep current water take permit process.
800.8	TEMPLETON Vaughan	Rule 54		The new rule appears to be entirely unworkable for larger land holdings for very little benefit to smaller land holding that probably have no use for that quantity of water. Retain the current water take process.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
801.7	Terrace Farm Trust & Johnrey Trust	Rule 54	Support	Retain.
811.24	THYS Herman & STAUT Tinneke	Rule 54	Support	Retain.
832.114	VAN GOOL Raewyn	Rule 54	Support	Retain.
850.2	WaterForce Southland	Rule 54	Amend	A review of the Quantities and Science on how this rule works practically is needed to manage this resource.
861.26	WHITE John Copeland	Rule 54	Oppose	We recommend that ES keep current water take permit process.
868.26	Wilkins Farming Ltd	Rule 54	Support	Retain this rule assuming it hasn't changed from the previous regulation.
877.61	WILSON Aaron	Rule 54	Oppose in part	The Water and Land Plan needs to provide certainty of water abstraction rights that the present consenting regime delivers.
880.65	WILSON Shannon	Rule 54	Oppose in part	The W&L plan needs to provide certainty of water abstraction rights that the present consenting regime delivers.
895.56	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Rule 54	Amend	<p>Amend</p> <p><b>Rule 54 - Abstraction and use of groundwater</b></p> <p>(a) The take and use of groundwater is a permitted activity provided the following conditions are met:</p> <p>(i) the rate and volume of abstraction does not exceed:</p> <p>(1) a maximum of 86 cubic metres per day per landholding; and</p> <p>(2) a maximum rate of 5 litres per second; and</p> <p>(3) the point of abstraction is not within 50 metres of an existing lawfully established groundwater take;</p> <p>(ii) the maximum volume of take allowed under this rule and Rule 50(a) is not added. A maximum of 86 cubic metres of groundwater and surface water combined per landholding per day is allowed;</p> <p>(iii) the following details are supplied to Environment Southland upon request:</p> <p>(1) farming type;</p> <p>(2) stocking rate; and</p> <p>(3) point of abstraction.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(b) The non-consumptive take and use of groundwater is a permitted activity provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) the rate and volume of take does not exceed: <ul style="list-style-type: none"> <li>(1) a maximum rate of 10 litres per second;</li> <li>(2) a maximum daily volume of 750 cubic metres;</li> <li>(3) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct or High, the relevant surface water minimum flows and allocation limits are met;</li> <li>(4) any interference effects are “acceptable” in accordance with Appendix L.3;</li> </ul> </li> <li>(ii) the same amount of water is returned to the same waterbody or aquifer within 250 metres of the point at which it was taken;</li> <li>(iii) there is no significant delay between the taking and returning of the water.</li> </ul> <p>(c) The take and use of groundwater for hydraulic testing and bore development purposes and any associated discharge of groundwater into water or onto or into land is a permitted activity provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) Environment Southland must be notified at least three days prior to test commencement;</li> <li>(ii) the rate of take must not exceed 75 litres per second;</li> <li>(iii) the duration of pumping does not exceed five consecutive days;</li> <li>(iv) any discharge of water to water is consistent with water quality requirements of section 70 of the RMA;</li> <li>(v) water discharged onto land must not contribute to flooding on any other landholding;</li> <li>(vi) records of all pumping and recovery tests including the rate and duration of pumping, water levels in the pumped well and any water level observation wells and the time measurements are taken are provided to Environment Southland within one month of the completion of the test.</li> </ul> <p><u>(x) The take and use of groundwater for temporary construction dewatering activities is a permitted activity provided the following conditions are met:</u></p> <ul style="list-style-type: none"> <li><u>(i) Environment Southland must be notified at least three days prior to dewatering commencing;</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>(ii) the rate of take does not exceed 40 litres per second;</u></p> <p><u>(iii) the duration of pumping does not exceed 10 consecutive days;</u></p> <p><u>(iv) the point of abstraction is not within 50 metres of an existing lawfully established groundwater take;</u></p> <p><u>(v) records of the rate and duration of pumping are taken and are provided to Environment Southland within three months.</u></p> <p>(d) Other than that provided by Rule 54(a) <u>and 54(x)</u>, groundwater takes from groundwater management zones listed in Appendix L is a discretionary activity provided the following conditions are met:</p> <p>(i) the total groundwater allocation is within the primary or secondary allocation limits established in Appendix L.5; and</p> <p>(ii) if the degree of hydraulic connection, calculated in accordance with Appendix L.2 is not Riparian, Direct or High, the relevant surface water minimum flows and allocation limits are met;</p> <p>(iii) any interference effects are ‘acceptable’ in accordance with Appendix L.3;</p> <p>(iv) if the total groundwater allocation is within the secondary allocation limit, then minimum groundwater level cut-offs and seasonal recovery triggers are established in accordance with criteria outlined in Appendix L.6.</p> <p>(e) Other than that provided by Rule 54(a) <u>and 54(x)</u>, the take and use of groundwater from a confined aquifer is a discretionary activity provided the following conditions are met:</p> <p>(i) total groundwater allocation is within the primary allocation limits (including minimum water level cut-offs and seasonal recovery triggers) established in Appendix L.5 or following the methodology outlined in Appendix L.6;</p> <p>(ii) any interference effects are ‘acceptable’ in accordance with Appendix L.3;</p> <p>(f) Other than that provided by Rule 54(a) <u>and 54(x)</u>, the take and use of groundwater outside groundwater management zones listed in Appendix L.5 is a discretionary activity provided the following condition is met:</p> <p>(i) any interference effects are ‘acceptable’ in accordance with Appendix L.3;</p> <p>(g) The take and use of groundwater that does not comply with Rules 54(b) to 54(f) is a non-</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				complying activity.

### Rule 55 – Monitoring and sampling structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.109	Aratiatia Livestock Ltd	Rule 55	Support	Retain.
108.87	BYTHELL Jesse	Rule 55		I seek the addition of the following clause in Rule 55(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
372.16	Heritage NZ	Rule 55	Support in part Amend	Retain Rule 55(a)(vii).
752.148	Southland Fish & Game Council	Rule 55	Support Amend	Retain Rule 55 as notified and amend Rule 55(a) to include the following bullet point: <u>(xiii) The structure does not impede any legal access to the river, modified watercourse or lake.</u>
832.115	VAN GOOL Raewyn	Rule 55	Support	Retain.

### Rule 56 – Boat ramps, jetties and wharves

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.110	Aratiatia Livestock Ltd	Rule 56	Support	Retain.
664.24	Real Journeys Ltd	Rule 56		Amend Rule 56 to provide reconstruction as a permitted activity.
752.149	Southland Fish & Game Council	Rule 56	Support Amend	Retain and amend Rule 56(b) to include the following bullet point: <u>(vii) The structure does not impede any legal access to the river, modified watercourse or lake.</u>  – In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				that Council in exercising its discretion will consider, among other things: “ <u>Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.</u> ”
832.116	VAN GOOL Raewyn	Rule 56	Support	Retain.

### Rule 57 - Bridges

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.88	BYTHELL Jesse	Rule 57		I seek the addition of the following clause in Rule 57(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
172.18	COWAN Les & Christine	Rule 57	Oppose	Delete rule and leave us to make our own bridges or those who know what is required to do so.
210.89	Director-General of Conservation	Rule 57	Support in part	Amend (b) 2. To include: <u>Natural features and landscapes.</u>
233.24	DYSON Valerie & Glyn	Rule 57	Support	Retain.
372.17	Heritage NZ	Rule 57	Support in part Amend	Retain Rule 57(a)(xi) and associated matter of discretion 2.
395.2	HUDSON P D & P A E	Rule 57(a)(i)	Oppose	Bridge replacement should be a case by case situation.
449.26	KiwiRail Holdings Ltd (KiwiRail)	Rule 57	Amend	Retain Rule 57 (a) (vii) and (viii)  Retain Rule 57(c)  Amend as follows: Rule 57 – Bridges (a) The placement, erection or reconstruction of any bridge in, on or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity is a permitted activity provided the following conditions are met: (i) there are no support structures (for example, piles) in the bed; <b><u>unless for the</u></b>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><b><u>reconstruction of a bridge where there are existing support structures in the bed and no additional support structures are proposed; ...</u></b>  <del>(xi) there are no recorded historic heritage sites, at the site of the activity; ...</del></p>
611.12	NZ Defence Force	Rule 57	Oppose	<p>Insert a new permitted activity rule as follows, with no permitted activity standards:  <u>“The use, erection, construction, placement, removal, or demolition of a temporary bridge for military training activities in, on, under or over the bed of a stream or river, and associated bed disturbance, provided that:</u>  <u>(a) The bridge is removed entirely within 2 weeks of its erection.”</u></p>
614.23	NZ Transport Agency	Rule 57	Support	Retain.
752.150	Southland Fish & Game Council	Rule 57	Support Amend	<p>Retain Rule 57 as notified and amend Rule 57(a) to include the following bullet points:  <del>(xvii) The structure does not impede any legal access to the river, modified watercourse or lake.</del>  <del>(xviii) Where the bridge is intended for use by stock and / or vehicles, the bridge and abutments are designed and constructed to avoid animal waste or sediment entering the river, lake or modified watercourse.</del></p> <p>Amend Rule 57(b) to provide:</p> <p>“Environment Southland will restrict its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. The design and location of the bridge;</li> <li>2. Effects on flood risk, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats (<u>including fish passage</u>), the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, <u>landscape</u>, natural character and amenity values, <u>public access and recreational values</u>, and navigational safety.</li> <li>3. Any conditions in Rule 57(a) that cannot be met.”</li> </ol> <p>Insert new numbered bullet point:  <u>“4. Consideration of outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things: “ <u>Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.</u> ”
759.21	Springlands Group Ltd	Rule 57	Support	Retain.
832.117	VAN GOOL Raewyn	Rule 57	Support	Retain.
877.62	WILSON Aaron	Rule 57	Support	Retain.
880.66	WILSON Shannon	Rule 57	Support	Retain.

#### Rule 58 – Cables, wires and pipes

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.89	BYTHELL Jesse	Rule 58(a)		I seek the addition of the following clause in Rule 58(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
209.40	DIPROSE Dave	Rule 58	Support	Retain.
372.18	Heritage NZ	Rule 58	Support in part Amend	Retain Rule 58(a)(xv) and associated matter of discretion 2.
449.27	KiwiRail Holdings Ltd (KiwiRail)	Rule 58	Amend	Amend as follows: Rule 58 – Cables, wires and pipes (a) The placement, erection or reconstruction of any cable, wire, pipe or pipeline (including any intake or discharge pipe or temporary gauging) and associated safety signs or markers in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity is a permitted activity provided the following conditions are met: ... <del>(xv) there are no recorded historic heritage sites, at the site of the activity; ...</del>
562.17	Meridian Energy Ltd	Rule 58	Oppose in part	Amend Rule 58 (b) to read: (b) The placement, erection or reconstruction and any associated bed disturbance of any

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				cable, wire, pipe or pipeline (including any intake or discharge pipe or temporary gauging) and associated safety signs or markers in, on, under or over the bed of any river, modified watercourse, or lake <u>or discharge resulting from the carrying out of the activity</u> that does not meet one or more of the above conditions of Rule 58(a) is a restricted discretionary activity.
664.25	Real Journeys Ltd	Rule 58		We Believe this rule should also provide for fences especially if the council wishes to keep stock out of waterways.
752.151	Southland Fish & Game Council	Rule 58	Support Amend	Retain Rule 58 as notified and amend Rule 58(a) to include the following bullet point: <u>(xxii) The structure does not impede any legal access to the river, modified watercourse or lake.</u>  Amend Rule 58(b) to provide: <i>“Environment Southland will restrict its discretion to the following matters:</i>  1. The design and location of the structure; 2. Effects on flood risk, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats <u>(including fish passage)</u> , the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, <u>landscape</u> , natural character and amenity values, navigation and aviation hazard, and public access and recreation values;  3. Any conditions in Rule 58(a) that cannot be met.
752.152	Southland Fish & Game Council	Rule 58	Oppose	– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things: <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u>
832.118	VAN GOOL Raewyn	Rule 58	Support	Retain.

### Rule 59 – Culverts and sediment traps

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
13.6	All In Ltd	Rule 59	Support in part Amend	We recommend that section (a)(l) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
24.111	Aratiatia Livestock Ltd	Rule 59	Support	Retain.
54.15	Bayswater Dairy Ltd	Rule 59	Support Amend	Amend Section (a) (i) so that the maximum diameter is increased from 1200mm to 1800mm.
73.14	BLACK Family Trust	Rule 59	Support	Retain.
79.8	BLAIR Phillipa Mary	Rule 59	Amend	A minimum width and height would ensure better constructed culverts.
97.5	Brunel Peaks Ltd	Rule 59	Amend	Increase permitted culvert size to 1.6m.
99.10	BUCKINGHAM Greta	Rule 59	Amend	Replacement/restoration of a damaged culvert must be allowed to happen in a timely manner without having to get a consent in case of discharge or bed disturbance. A minimum width to height ratio would be a far better tool to ensure stable safe culverts were being constructed as opposed to a limit on height.
101.11	BUCKINGHAM Thomas	Rule 59	Amend	Replacement/restoration of a damaged culvert must be allowed to happen in a timely manner without having to get a consent in case of discharge or bed disturbance.  Instead of a limit on height, a minimum width to height ratio would be a far better tool to ensure stable, safe culverts were being constructed.
103.9	BYARS A R & L J Trust	Rule 59	Amend	Should be able to apply for a bigger size if more environmentally beneficial.
108.90	BYTHELL Jesse	Rule 59		I seek the addition of the following clause in Rule 59(a), 'there shall be no damage or destruction of significant indigenous vegetation.'
114.8	CALLAHAN Pamela	Rule 59	Oppose	Health and safety is a priority and good access is imperative. We cannot wait for consent to fix culverts. The culverts have to be built to a height and standard that they are not a hazard to farm vehicles.
120.6	CARTER D G & B J	Rule 59(a)(i)	Oppose Amend	Allow consultation with Environment Southland if a possible over size pipe might be needed.
154.4	Coastal Plains Ltd	Rule 59	Support Amend	We recommend that section (a)(i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
155.8	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 59	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
173.6	COWIE Martin	Rule 59	Oppose	Design, positioning and when to replace and restore should be left up to the farmer/digger operator. A minimum width to height ratio would be a far better tool to ensure stable safe culverts were being constructed.
175.6	CRACK Stephen	Rule 59	Oppose	Delete clause 59 (a)(v).
181.14	CRUICKSHANK Peter & Liz	Rule 59		Delete Rule 59.
209.41	DIPROSE Dave	Rule 59	Support	Retain.
233.25	DYSON Valerie &Glyn	Rule 59	Support	Retain.
247.18	Environment Southland	Rule 59	Amend	Amend Rule 59(a)(viii) as follows: (viii) fill over any culvert shall not be greater than 4 metres <u>measured from the bed</u> ;
249.27	Ernslaw One Ltd	Rule 59	Support Amend	Amend the conditions of Rule 59 to require that any culvert be designed to pass a 1 in 20 year flood without heading up. For single culvert structures to be installed where the stream bed is more than 1 m wide, but less than 3m wide, include a specific requirement to use the NIWA on-line flood design model, or alternatively commission a flood design by suitable qualified hydrologist or CP Eng, and require that the Council be supplied with calculations using two independent flood design methods.
283.5	Foveaux Investments Ltd	Rule 59	Amend	We suggest that ES publishes a set of acceptable designs that culvers 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. Remove the section titled “Environment Southland will exercise control over the following matters”.
313.11	GILLESPIE Maria	Rule 59	Support Amend	Retain but that the permitted sediment trap size be 10 square metres.
314.8	Gladvale Farms Ltd	Rule 59(a)(i)	Oppose Amend	Maximum diameter should be 2.5 metres.
334.5	Greenvale Station Ltd	Rule 59	Amend	To keep stock out of waterways, we need more ability to create crossings of appropriate sizes. Increase maximum size of culverts.
337.18	Growplan Ltd	Rule 59		<further comment>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
339.15	GUNN Olivia	Rule 59	Support	We recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
361.16	HBG AgriLimited	Rule 59	Support Amend	Amend Section (a)(i) so that the maximum diameter is increased from 1200mm to 1800mm.
372.19	Heritage NZ	Rule 59	Support in part Amend	Retain Rule 59(a)(xvi) and associated matter of discretion 2.
386.15	Hopcroft Farms Ltd	Rule 59	Support	I recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
397.3	Hughes-Crowley Company Ltd	Rule 59	Support in part Amend	We recommend that section (a)(i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
402.18	HUNT Alistair & Bernadette	Rule 59	Amend	Delete 59(a)(ii).
408.4	Hynds Pipe Systems Ltd	Rule 59	Support	Retain.
431.6	Kaikaha Farms Ltd	Rule 59	Support in part Amend	We recommend that section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
449.28	KiwiRail Holdings Ltd (KiwiRail)	Rule 59	Support in part	Retain Rule 59 (a) (v), Rule 59 (a) (xii) and Rule 59 (a) (xiii).  Amend as follows: Rule 59 – Culverts and Sediment Traps (a) The placement, erection or reconstruction of any culvert, including any associated inlet or outlet protection structure, or sediment trap in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(xvi) there are no recorded historic heritage sites, at the site of the activity,...</del>
461.7	LAMB Bruce & Gaye	Rule 59	Amend	Allow replacement/restoration of a damaged culvert and amend the limit on height to a minimum width to height ratio to ensure safe culverts are being constructed.
477.10	Longwood Properties Ltd	Rule 59	Amend	We suggest 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.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
482.20	Lower Aparima Catchment Group	Rule 59	Support	We recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
502.10	MARSHALL Allan & Kathryn	Rule 59	Amend	Replacement/restoration of a damaged culvert must be allowed to happen in a timely manner without having to get a consent in case of discharge or bed disturbance. A minimum width to height ratio would be a far better tool to ensure stable safe culverts were being constructed. Delete reference to sediment traps.
507.10	MARSHALL Spencer	Rule 59	Amend	Replacement/restoration of a damaged culvert must be allowed to happen in a timely manner without having to get a consent in case of discharge or bed disturbance.  A minimum width to height ratio would be a far better tool to ensure stable safe culverts were being constructed.
523.9	MCGREGOR Grant	Rule 59	Support Amend	(viii) fill over any culvert shall not be greater than 4 metres; <u>(measured from the crest of the dam to the bed.</u>
562.18	Meridian Energy Ltd	Rule 59	Oppose in part	<b>Amend</b> Rule 59 (b) to read: (b) The placement, erection or reconstruction and any associated bed disturbance of any culverts, including any associated in the outlet to protection structure, or sediment trap, in, on, under or over the bed of any river, modified watercourse, or lake <u>or discharge resulting from the carrying out of that activity</u> that does not meet one or more of the above conditions of Rule 58(a) is a controlled activity.
564.16	Mid-Aparima Catchment Group	Rule 59	Support Amend	We recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
614.24	NZ Transport Agency	Rule 59	Support Amend	Rule 59 – Culverts and Sediment Traps (a) The placement, erection or reconstruction of any culvert, including any associated inlet, <u>invert</u> , or outlet protection structure, or sediment trap in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: (i) the maximum <u>cross sectional area of any culvert shall be 2,54m<sup>2</sup></u> <del>diameter of any culvert shall be 1,200 millimetres;</del> (ii) any culvert is a single structure (i.e. it is not placed in combination with other culverts across the width of the river); (iii) any culvert shall be positioned so that its alignment is the same as the river;

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(iv) any culvert shall be designed to pass <del>flow flows</del> a 0.5% AEP flood event (either through, around or over the culvert) and shall not increase the risk of flooding <u>or damage to neighbouring properties or network utilities upstream or downstream of the culvert</u>;</p> <p>(v) the invert (or bottom) of any culvert shall be installed to a depth of either 300 mm below the natural bed level or one-third of the diameter of the culvert, whichever is the lesser;</p> <p>(vi) any culvert shall be purpose built for the passage of water (i.e. it shall not be a drum, container or other item not designed as a culvert);</p> <p>(vii) any sediment trap is less than or equal to 2.5 square metres in surface area;</p> <p>(viii) fill over any culvert shall not be greater than 4 metres;</p> <p>(ix) any structure is not within any mātaimai, nohoanga, or taiāpure;</p> <p>(x) fish passage shall not be impeded as a result of the activity;</p> <p>(xi) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(xii) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</p> <p>(xiii) any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</p> <p>(xiv) no fuel storage or machinery refuelling shall occur on any area of the bed;</p> <p>(xv) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p><del>(xvi) there are no recorded historic heritage sites, at the site of the activity;</del></p> <p>(xvii) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(xviii) all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</p> <p>(xix) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</p> <p>(xx) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</p> <p>(b) The placement, erection or reconstruction and any associated bed disturbance of any culvert, including any associated inlet or outlet protection structure, or sediment trap, in, on, under or over the bed of any river, modified watercourse, or lake that cannot meet one or</p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>more of the conditions of Rule 59(a) is a controlled activity.</p> <p>Environment Southland will exercise control over the following matters:</p> <ol style="list-style-type: none"> <li>1. the design of the culvert;</li> <li>2. any effects on flood risk, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitat (including fish passage), taonga species, the spiritual and cultural values and beliefs of the tangata whenua, and historic heritage;</li> <li>3. any conditions in Rule 59(a) that cannot be met.</li> </ol> <p>(c) The use of any culvert including any associated inlet or outlet protection structure or sediment trap in, on or over the bed of any river, modified watercourse, or lake is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>(i) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</li> <li>(ii) any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable;</li> <li>(iii) the structure shall be maintained in a state of good repair; and</li> <li>(iv) no contaminants, shall be discharged to water as a result of use of the structure unless allowed by a relevant permitted activity rule or resource consent; <del>and</del></li> <li>(v) <u>any culvert shall not increase the risk of flooding or damage to neighbouring properties or network utilities upstream or downstream of the culvert;</u></li> </ol> <p>(d) The use of any culvert including any associated inlet or outlet protection structure or sediment trap in, on or over the bed of any river, modified watercourse, or lake that does not meet one or more of the conditions of Rule 59(c) is a discretionary activity.</p>
622.26	P F Olsen Ltd	Rule 59	Support Amend	Amend the conditions of Rule 59 to require that any culvert be designed to pass a 1 in 20 year flood without heading up. For single culvert structures to be installed where the stream bed is more than 1 metre wide but less than 3 metres wide, include a specific requirement to use the NIWA on-line flood design by suitable qualified hydrologist or CP Eng. And require that the Council be supplied with calculations using two independent flood design methods.
646.9	Progress Valley Farms Ltd	Rule 59	Amend	Replacement/restoration of a damaged culvert must be allowed to happen in a timely manner without having to get a consent in case of discharge or bed disturbance. Also the limit on height is odd as it seems irrelevant for protecting the environment and possibly more revenue gathering in the form of consents. A minimum width to height ratio would be a far better tool to ensure stable safe culverts were being constructed.
666.24	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 59	Amend	Remove the less than 2.5m <sup>2</sup> restriction, or if this is really needed make it bigger.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
681.19	Rockytommy Farming Ltd	Rule 59	Support in part Amend	We recommend that section (a)(i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
681.20	Rockytommy Farming Ltd	Rule 59	Oppose in part	Allow farmers to put in sediment nutrient traps/ponds at the bottom of gullies (critical source areas) without consent to minimise impact on waterways.
682.15	Rokenwai Farming Ltd	Rule 59	Oppose in part	Allow farmers to put in sediment nutrient traps/ponds at the bottom of gullies (critical source areas) without consent to minimise impact on waterways.
697.14	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 59	Support	Retain.
708.4	Scandrett Rural Ltd	Rule 59	Amend	Clause (a)(vii) limits the size of sediment trap to 2.5 square metres in surface area without a consent. It is suggested they be built as a permitted activity if they are less than 15m <sup>2</sup> in surface area.
737.29	Smithill Ltd	Rule 59	Support in part Amend	(a), (i) - We do not support the limitation of the culvert dimension that can be installed without a consent, this should be amended to support and encourage individuals to correctly install the right sized culvert for the size of the stream. Environment Southland could provide a guide to indicate the correct culvert size for the water course in question.  (a), (vii) - We do not support the limit of the surface area for a sediment trap. The installation of a sediment trap is to the benefit of water quality these can be utilised to their advantage in the case of winter grazing, to trap sediments.
741.5	South Hughes Farms Ltd	Rule 59	Support in part Amend	We recommend that section (a)(l) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
742.12	South Island Eel Industry Association	Rule 59	Amend	We recommend a change to section (a) (x) to: <u>Upstream and downstream</u> fish passage shall not be impeded as a result of the activity; We object to section (b) allowing non-compliance with the fish passage condition to remain a Controlled Activity. We require such non-compliance to force this to be a Discretionary Activity. Section (c) also needs a subsection (v) which states: <u>Upstream and downstream fish passage shall not be impeded as a result of the activity;</u> It is unacceptable to allow any activity to continue, which may impede the upstream/downstream passage of fish.
752.153	Southland Fish & Game Council	Rule 59	Support Amend	Retain Rule 59 and amend Rule 59(a) to include the following bullet point:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>(xxiii) The culvert does not impede any legal access to the river, modified watercourse or lake.</u></p> <p>Amend Rule 59(b) to provide:  “Environment Southland will restrict its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. The design <u>and location</u> of the culvert;</li> <li>2. Effects on flood risk, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats (including fish passage), the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, <u>landscape, natural character and amenity values, navigational safety, and public access and recreation values;</u></li> <li>3. Any conditions in Rule 59(a) that cannot be met.</li> </ol> <p>– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things:  <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.8	Southland River Liaison Committees	Rule 59	Support Amend	(viii) fill over any culvert shall not be greater than 4 metres; <u>(measured from the crest of the dam to the bed);</u>
759.22	Springlands Group Ltd	Rule 59	Support in part	Permit two culverts up to 600mm in diameter to be placed in the same crossing.
761.16	STALKER Hanna & Callum	Rule 59	Support	Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
765.6	Stenkoll Farms Ltd	Rule 59	Support in part Amend	We recommend that section (a)(i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
790.11	TAIT G R & J E & Waikawa Valley Trust	Rule 59	Oppose	Allowing freedom of size based on enhancing naturally occurring traps would be more effective than limiting size to 2.5 square metres.
792.32	TAYLER Matthew	Rule 59	Support	Retain.
798.10	TEMPLETON Luke	Rule 59	Support	I recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
799.11	TEMPLETON Peter	Rule 59	Support	Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
800.9	TEMPLETON Vaughan	Rule 59	Oppose	(a)(i) that limits the size of culverts that can be installed without a consent. I oppose this limit. It tends to push owners to install 1.2m pipes when it would probably be a better outcome for water quality and aquatic life in general to encourage the installation of larger pipes.
813.10	Tihaka Farms	Rule 59	Amend	We believe that the section titled “Environment Southland will exercise control over the following matter:” be removed from Rule 59 - with particular reference to require a culvert design to be approved by Environment Southland. We suggest that 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.
815.4	Timpany Investments Ltd	Rule 59	Amend	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 ES. We suggest that ES 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.
832.119	VAN GOOL Raewyn	Rule 59	Support	Retain.
842.10	Waihoaka Holdings Ltd	Rule 59	Amend	We suggest that 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.
861.27	WHITE John Copeland	Rule 59	Support	We recommend that Section (a) (i) be changed so that the maximum diameter is increased from 1200mm to 1800mm.
864.9	Whyte Partnership	Rule 59	Amend	Increase the maximum culvert pipe diameter.
877.63	WILSON Aaron	Rule 59	Support	Retain.
880.67	WILSON Shannon	Rule 59	Support	Retain.

## Rule 60 – Dams and weirs

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
14.6	ALLAN Frazer & Karen	Rule 60	Amend	Remove the requirement to have the dam/pond wall certified

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.44	Alliance Group Ltd	Rule 60	Oppose in part	Amend Rule 60 (d) as follows: The placement or erection of <u>new</u> dams or weirs in the Mataura or Waikaia River, including the tributaries is a prohibited activity. <u>This does not include the reconstruction of any existing dams or weirs.</u>
25.33	Ardel Dairies Ltd	Rule 60	Oppose	This should be a discretionary activity.
47.23	Balfour, Wendonside & Waikaia Group	Rule 60	Oppose in part	Remove ‘including tributaries’ from Rule 60(d).
99.11	BUCKINGHAM Greta	Rule 60	Amend	Move sediment traps to Rule 60 and remove limit on size.  A dam (happens to catch sediment) under 500ha catchment does not require consent, this is a huge area and should be halved. The need for a consent could be added here, along with the need for an engineers sign off. so that under 250ha doesn't require a consent or engineers sign off provided it meets the other requirements in the rule. And large dams with large catchments that pose a larger risk should they fail will require consent and engineers sign off.
101.12	BUCKINGHAM Thomas	Rule 60	Amend	Move sediment traps to this rule from Rule 59 and question why their size and effectiveness without a consent be limited to 25m <sup>2</sup> .  A dam (happens to catch sediment) under 500ha catchment does not require consent, this is a huge area and should be halved. The need for a consent could be added here, along with the need for an engineers sign off. so that under 250ha doesn't require a consent or engineers sign off provided it meets the other requirements in the rule. And large dams with large catchments that pose a larger risk should they fail will require consent and engineers sign off.
108.91	BYTHELL Jesse	Rule 60		I seek the addition of the following clause in Rule 60 (a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
114.9	CALLAHAN Pamela	Rule 60	Oppose	Surely we should be encouraged to build ponds for sediment traps and sanctuaries for waterfowl. But consents and engineer’s reports should only be needed for large ponds.
125.3	CHARTRES Peter	Rule 60	Amend	Delete Rule 60(a)(ii).
208.6	DILLON M J & S E	Rule 60	Oppose	Remove “including tributaries” from Rule 60(d).
233.26	DYSON Valerie &Glyn	Rule 60	Support	Retain.
245.6	Enfield Ltd	Rule 60(a)(ii)	Oppose	Make building a wall less than 4 metres a permitted activity.
247.19	Environment Southland	Rule 60	Amend	Amend Rule 60 as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(a) <del>The use</del>, placement, erection or reconstruction of any dam or weir, in, on or over the bed of any lake, river, modified watercourse and the associated damming of water (either inside or outside the bed of a river or lake), and associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</p> <p>(i) <del>if</del> the maximum height of the dam is 4 metres or less in height (measured from the crest of the dam to the bed), <u>and</u> the impoundment volume shall be less than 20,000 cubic metres;</p> <p>...</p> <p><u>(aa) The use of any dam or weir is a permitted activity provided the following conditions are met:</u></p> <p>(i) <u>the structure is lawfully established;</u></p> <p>(ii) <u>the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</u></p> <p>(iii) <u>any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable;</u></p> <p>(iv) <u>the structure shall be maintained in a state of good repair; and</u></p> <p><u>no contaminants, other than sediment released from the bed, shall be discharges to water during the activity unless allowed by a relevant permitted activity rule.</u></p>
319.19	Glendhu Dairies Ltd	Rule 60	Oppose	Enable dams to be established in tributaries as a discretionary activity so that each case can be considered on its merits etc.
365.9	HEENAN M D and D W	Rule 60	Oppose	Amend rule to only require new dams to be certified, not existing ones.
414.11	Irrigation NZ Incorporated	Rule 60		(i) If the maximum height of the dam is 4 metres or less in height (measured from the crest of the dam to the bed) <u>and</u> the impoundment volume stored is less than 20,000 m <sup>3</sup> ;
444.5	KING Henry	Rule 60	Amend	Should not be a consented process, amend to permitted activity.
449.29	KiwiRail Holdings Ltd (KiwiRail)	Rule 60	Support	Retain.
461.8	LAMB Bruce & Gaye	Rule 60	Oppose	If dam kept below 4 metres in height no need for the added cost of an engineer.
464.28	Landpro Ltd	Rule 60	Oppose in part	Remove Rule 60(d) as it is adequately covered by the Oreti and Mataura Conservation Orders.
487.5	M K H Farming Ltd	Rule 60	Oppose	Delete.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Amend	
502.11	MARSHALL Allan & Kathryn	Rule 60	Amend	Amend to include provisions for sediment traps. Under 250Ha doesn't require a consent or engineers sign off provided it meets the other requirements in the rule. And large dams with large catchments greater than 250m that pose a larger risk should they fail will require consent and engineers sign off.
507.11	MARSHALL Spencer	Rule 60	Amend	The need for consent for a dam (happens to catch sediment) with a 500 ha catchment along with the need for an engineers' sign off. Under 250ha doesn't require a consent or engineers sign off provided it meets the other requirements in the rule. And large dams with large catchments that pose a larger risk should they fail will require consent and engineers sign off.
560.12	MCRAE Tim & Justine	Rule 60 (a)(ii)	Oppose	If a dam is under 4m tall, then an engineering report is not required.
604.11	Nokomai Station Ltd	Rule 60	Oppose in part	Remove 'including tributaries' from Rule 60(d).
614.25	NZ Transport Agency	Rule 60	Support Amend	Add: <b>Note 3:</b> This rule does not apply to weirs constructed for erosion control purposes under Rule 61.
646.10	Progress Valley Farms Ltd	Rule 60	Amend	A dam (happens to catch sediment) under 500 ha catchment doesn't require consent, this is a huge area and should be halved. The need for consent could be added here, along with the need for an engineers' sign off. So that under 250ha doesn't require a consent or engineers sign off provided it meets the other requirements in the rule. And large dams with large catchments that pose a larger risk should they fail will require consent and engineers sign off.
667.9	Riverfield Farms Ltd	Rule 60	Oppose	Expand to allow the suitable and experienced construction operators to design and construct dams and weirs.
681.21	Rockytommy Farming Ltd	Rule 60	Oppose in part	Remove 'including tributaries' from Rule 60(d).
682.16	Rokenwai Farming Ltd	Rule 60	Oppose in part	Remove 'including tributaries' from Rule 60(d).
697.15	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 60	Support	Retain.
708.5	Scandrett Rural Ltd	Rule 60	Amend	It is suggested that dams below 0.5m in height to the crest are able to be constructed as a permitted activity without the need to meet clause (a)(ii), provided the remainder of conditions described in clause (a) are met.
752.154	Southland Fish & Game Council	Rule 60	Oppose	Amend to: “(i) if the maximum height of the dam is less than 3 metres or less in height (measured from

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>the crest of the dam to the bed) and the impoundment less than 20,000m<sup>3</sup>.The dam retains less than 3 metres depth, and holds less than 20 000 cubic metres volume, of water or other fluid;”</del></p> <p><del>(ii) the design and construction of the dam or weir is certified by a suitably qualified and experienced engineer;</del></p> <p>“(viii) The dam or weir is not in the Mataura, Oreti, <u>Aparima</u> or Waikaia River.”...</p> <p>...<del>(xxiii) The dam does not impede any legal access to the river, modified watercourse or lake.”...</del></p> <p>(c) The damming of water on <u>the</u> main stems of the Aparima River, downstream of the Aparima Forks at NZ Topo 50 CE09 051 299, and the Oreti River, <del>down</del><u>up</u>stream of <u>Rocky Point at NZMS 260 E44 373 946</u> <del>the forks at NZ Topo 50 CC09 245 832</del> is a non-complying activity.”</p> <p>(e) The placement or erection of dams or weirs in the Mataura or Waikaia Rivers, <del>including the tributaries,</del> <u>and in the Oreti River main stem at Rocky Point at NZMS 260 E44 373 946 upstream to the forks at E42 345 450</u> is a prohibited activity.</p> <p>– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things:  <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
759.23	Springlands Group Ltd	Rule 60	Support in part	Suggest a limit on the height of the dam or the volume of the storage is necessary before a suitably qualified and experienced engineer is required.
766.12	STEVENS Brendon	Rule 60	Oppose	Remove “including tributaries” from Rule 60(d).
828.8	Twin Farm Ltd	Rule 60	Oppose	Remove “including tributaries” from Rule 60 (d)
832.120	VAN GOOL Raewyn	Rule 60	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
864.10	Whyte Partnership	Rule 60	Amend	Remove requirement for a certification for a dam wall 4m or less.
865.8	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Rule 60	Amend	Removal of the requirement to have the dam/pond wall certified.

### Rule 61 – Erosion control structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.92	BYTHELL Jesse	Rule 61		I seek the addition of the following clause in Rule 61(a)&(b), ‘there shall be no damage or destruction of significant indigenous vegetation.’
152.25	Clover Bell Ltd	Rule 61	Support	Retain.
233.27	DYSON Valerie &Glyn	Rule 61	Support	Retain.
355.12	HARRIS David	Rule 61	Amend	Change permitted activity to restricted discretionary activity.
372.20	Heritage NZ	Rule 61	Support in part Amend	Retain Rule 61(a)(xi)&(b)(xv).
449.30	KiwiRail Holdings Ltd (KiwiRail)	Rule 61	Amend	Amend as follows: Rule 61 - Erosion control structures (a) Notwithstanding any other rule in this Plan, the placement or reconstruction of rock rip rap, <b>gabion baskets, groynes</b> , or anchored or layered trees in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(xi) there are no recorded historic heritage sites, at the site of the activity;...</del>  (b) The placement or reconstruction of concrete in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(xv) there are no recorded historic heritage sites, at the site of the activity;...</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
523.10	MCGREGOR Grant	Rule 61	Support Amend	(iii) There shall be no planting of pest plant species as identified in the Regional Pest Management Strategy for Southland 2013 or Biosecurity NZ Register of Unwanted Organisms <u>excluding the use of crack willow for river control purposes;</u>
614.26	NZ Transport Agency	Rule 61	Support Amend	<p>Rule 61 - Erosion control structures</p> <p>(a) Notwithstanding any other rule in this Plan, the placement or reconstruction of rock rip rap, <u>erosion control structures, debris traps, rail and mesh, rope retards, gabion baskets, drop structures, groynes, weirs</u>, or anchored or layered trees in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</p> <p>(i) the work is not in a lake bed, national park, reserve or land in respect of which there is a covenant under the Conservation Act 1987, Queen Elizabeth the Second Trust Act 1977 or Reserves Act 1977 <u>unless the work is associated with the protection of a State highway or State highway asset;</u></p> <p>(ii) any anchored or layered trees shall be anchored to the bed or banks so that they will not wash away in a 2% Annual Exceedance Probability flood event;</p> <p>(iii) there shall be no planting of pest plant species as identified in the Regional Pest Management Strategy for Southland 2013 or Biosecurity NZ Register of Unwanted Organisms <u>(excluding the use of crack willow for river control purposes);</u></p> <p>(iv) the structure is not within any mātaimai, nohoanga, or taiāpure;</p> <p>(v) fish passage shall not be impeded as a result of the activity;</p> <p>(vi) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(vii) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</p> <p>(viii) any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</p> <p>(ix) no fuel storage or machinery refuelling shall occur on any area of the bed;</p> <p>(x) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p><del>(xi) there are no recorded historic heritage sites, at the site of the activity;</del></p> <p>(xii) before any equipment, machinery, or operating plant is moved to a new activity site it shall</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(xiii) all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</p> <p>(xiv) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</p> <p>(xv) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</p> <p>(xvi) any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable; and</p> <p>(xvii) the structure shall be maintained in a state of good repair.</p> <p>(b) The placement or reconstruction of <u>any formed</u> concrete in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity <u>for the purposes of erosion control</u>, is a permitted activity provided the following conditions are met:</p> <p>(i) the river is less than 3 metres wide on average over the area of construction;</p> <p>(ii) the placement of the concrete shall be for the sole purpose of remedying or mitigating an erosion problem;</p> <p>(iii) the work shall not be in a lake bed, national park, reserve or land in respect of which there is a covenant under the Conservation Act 1987, Queen Elizabeth the Second Trust Act 1977 or Reserves Act 1977;</p> <p>(iv) any individual concrete piece shall have a minimum length of 300 millimetres;</p> <p>(v) there shall be no concrete that has not set, or loose cement present;</p> <p>(vi) the concrete shall not have been used in direct contact with chemicals that are toxic to aquatic life;</p> <p>(vii) the concrete shall not contain asbestos pipe or asbestos cement mixtures;</p> <p>(viii) no reinforcing steel shall protrude from the completed works;</p> <p>(ix) fish passage shall not be impeded as a result of the activity;</p> <p>(x) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(xi) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</p> <p>(xii) any bed disturbance</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</p> <p>(xiii) no fuel storage or machinery refuelling shall occur on any area of the bed;</p> <p>(xiv) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p>(xv) there are no recorded historic heritage sites, at the site of the activity;</p> <p>(xvi) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(xvii) all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</p> <p>(xviii) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</p> <p>(xix) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</p> <p>(xx) any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable; and</p> <p>(xxi) the structure shall be maintained in a state of good repair.</p> <p>(c) The placement, erection or reconstruction of erosion control structures, <u>rock rip rap</u>, debris traps, rail and mesh, rope retards, gabion baskets, drop structures, groynes, weirs, <u>anchored or layered trees</u> and pre-formed concrete in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, <u>that does not that meet one or more of the conditions listed in Rule 61(a) or Rule 61(b) is a discretionary activity.</u></p>
622.27	P F Olsen Ltd	Rule 61	Support Amend	Amend 61(a) to include the placement, erection <u>and removal</u> ... debris traps, rail and mesh or wire rope slash traps etc.
752.155	Southland Fish & Game Council	Rule 61	Support Amend	<p>Amend Rule 61(a) to include:</p> <p><u>(xxiii) The structure does not impede any legal access to the river, modified watercourse or lake.</u></p> <p>And</p> <p>Delete Rule 61(b) in its entirety.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
753.9	Southland River Liaison Committees	Rule 61	Support Amend	(iii) there shall be no planting of pest plant species as identified in the Regional Pest Management Strategy for Southland 2013 or Biosecurity NZ Register of Unwanted Organisms <u>excluding the use of crack willow for river control purposes;</u>
792.33	TAYLER Matthew	Rule 61	Support in part	A condition added allowing limited bank battering and removal of gravel beaches on smaller creeks where erosion is occurring or the course of the creek is being altered and flood capacity compromised.
832.121	VAN GOOL Raewyn	Rule 61	Support	Retain.
877.64	WILSON Aaron	Rule 61	Support	Retain.
880.68	WILSON Shannon	Rule 61	Support	Retain.

## Rule 62 - Fords

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.93	BYTHELL Jesse	Rule 62		I seek the addition of the following clause in Rule 62 (a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
152.26	Clover Bell Ltd	Rule 62	Support	Retain.
209.42	DIPROSE Dave	Rule 62	Support	Retain.
233.28	DYSON Valerie &Glyn	Rule 62	Support	Retain.
249.28	Ernslaw One Ltd	Rule 62	Support Amend	Amend the conditions of Rule 62 to limit the use of the bed of a river for forwarding to no more than 20 axel crossings per day, at times when forwarding of the river causes a conspicuous change in water clarity, as measured 100m downstream after reasonable mixing.  Create a planning hierarchy that favours the installation of “dry fords” or culverts ahead of use of fords in beds of all rivers with permanent flow in Southland. Clause (c) should not have a reliance on “lawfully established” for any ford constructed or installed prior to 1991.
296.8	GARDYNE G W & E L Trust & C K Gardyne Ltd	Rule 62	Support	Retain.
372.21	Heritage NZ	Rule 62	Support in part Amend	Retain Rule 62(a)(vii).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
449.31	KiwiRail Holdings Ltd (KiwiRail)	Rule 62	Amend	Amend as follows: Rule 62 – Fords (a) The excavation of the bed of any river, modified watercourse or lake for the purpose of constructing a ford is a permitted activity provided the following conditions are met: ... <del>(vii) there are no recorded historic heritage sites, at the site of the activity; ...</del>
449.32	KiwiRail Holdings Ltd (KiwiRail)	Rule 62	Support	Retain Rule 62 (a) (iii).  Retain Rule 62 (a) (iv).
486.6	M Gardyne Ltd	Rule 62	Support	Retain.
622.28	P F Olsen Ltd	Rule 62	Support Amend	Amend the conditions of Rule 62 to limit the use of the bed of a river for forwarding to no more than 20 axel crossings per day, at times when forwarding of the river causes a conspicuous change in water clarity, measured 100m downstream after reasonable mixing.
697.16	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 62	Support	Retain.
752.156	Southland Fish & Game Council	Rule 62	Support Amend	Amend to: (a) The excavation of the bed of any river, modified watercourse or lake for the purpose of <del>constructing</del> maintaining a ford is a permitted activity provided the following conditions are met: ... <u>(xxiii) The ford does not impede any legal access to the river, modified watercourse or lake.</u>  <u>(xxiv) The ford is located in the Alpine or Bedrock / Hill Country physiographic zone.</u>  (b)... (ii) Where the ford is used as a vehicle <u>or stock crossing</u> , the activity shall meet the conditions set out in Rule 62(a); ...  <u>(vii) Fish passage shall not be impeded as a result of the activity; and</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>(viii) No alternative structure is available to facilitate stock or vehicle crossings.</u>
832.122	VAN GOOL Raewyn	Rule 62	Support	Retain.
877.65	WILSON Aaron	Rule 62	Support	Retain.
880.69	WILSON Shannon	Rule 62	Support	Retain.

### Rule 63 – Moorings, navigational aids and signs

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.94	BYTHELL Jesse	Rule 63		I seek the addition of the following clause in Rule 63 (b), ‘there shall be no damage or destruction of significant indigenous vegetation.’
247.20	Environment Southland	Rule 63	Amend	<p>Amend Rule 63 to delete the five references to navigational aids.</p> <p>Insert Rule 63A as follows:</p> <p><b><u>Rule 63A - Navigational aids</u></b></p> <p><u>(a) The placement, erection or reconstruction of a navigational aid in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</u></p> <p><u>(i) where the structure has been moved to the site from any other area, it shall be effectively cleaned to prevent the spread of pest species; and</u></p> <p><u>(ii) the structure shall be maintained in a state of good repair; and</u></p> <p><u>(iii) the structure is not within any mātaimai, nohoanga, or taiāpure.</u></p> <p><u>(b) The placement, erection or reconstruction and any associated bed disturbance of a navigational aid in, on, under or over the bed of any river, modified watercourse or lake, that does not meet one or more of the conditions of Rule 63(a), is a discretionary activity</u></p> <p><u>(c) The use of a navigational aid in, on, under or over the bed of any river, modified watercourse, or lake is a permitted activity provided the following conditions are met:</u></p> <p><u>(i) the structure shall not cause significant erosion of, or deposition on, the</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>surrounding bed or banks;</u></p> <p><u>(ii) any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable;</u></p> <p><u>(iii) the structure shall be maintained in a state of good repair; and</u></p> <p><u>(vi) no contaminants, shall be discharged to water as a result of use of the structure unless allowed by a relevant permitted activity rule or resource consent.</u></p> <p><u>(d) The use of a navigational aid in, on or over the bed of any river, modified watercourse, or lake that does not meet one or more of the conditions of Rule 63(c) is a discretionary activity.</u></p>
372.22	Heritage NZ	Rule 63	Support in part Amend	Retain Rule 63(b)(vii) and associated matter of discretion 2.
562.19	Meridian Energy Ltd	Rule 63	Oppose in part	<p><b>Amend</b> Rule 63 (b) to read:</p> <p>(b) The placement, erection or reconstruction and any associated bed disturbance of any mooring, navigational aid or sign, in, on, under or over the bed of any river, modified watercourse, or lake <u>or discharge resulting from the carrying out of the activity</u> that does not meet one or more of the above conditions of Rule 63(a) is a restricted discretionary activity....</p>
614.27	NZ Transport Agency	Rule 63	Support Amend	<p>Rule 63 - Moorings, navigational aids and <u>navigational</u> signs</p> <p>(a) The placement, erection or reconstruction of any mooring, navigational aid or <u>navigational</u> sign in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</p> <p>...</p> <p>(b) The placement, erection or reconstruction and any associated bed disturbance of any mooring, navigational aid or <u>navigational</u> sign in, on, under or over the bed of any river, modified watercourse or lake, that does not meet one or more of the conditions of Rule 63(a), is a restricted discretionary activity provided the following conditions are met:</p> <p>...</p> <p>(c) The use of any mooring, navigational aid or <u>navigational</u> sign in, on, under or over the bed of any river, modified watercourse, or lake is a permitted activity provided the following conditions are met:</p> <p>...</p> <p>(d) The use of any mooring, navigational aid and <u>navigational</u> sign in, on or over the bed of any</p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				river, modified watercourse, or lake that does not meet one or more of the conditions of Rule 63(c) is a discretionary activity.
664.26	Real Journeys Ltd	Rule 63		Include an advice note that the installation of moorings in National Parks require a DOC concession.
752.157	Southland Fish & Game Council	Rule 63	Oppose	– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things: <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u>
759.24	Springlands Group Ltd	Rule 63	Support	Retain.
832.123	VAN GOOL Raewyn	Rule 63	Support	Retain.

#### Rule 64 – Temporary canoe gate or ski lane markers

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.95	BYTHELL Jesse	Rule 64		I seek the addition of the following clause in Rule 64(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
372.23	Heritage NZ	Rule 64	Support in part Amend	Retain Rule 64(a)(iv) and associated matter of discretion 2.
666.25	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 64	Support	Retain.
832.124	VAN GOOL Raewyn	Rule 64	Support	Retain.

## Rule 65 – Whitebait stands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
72.1	Big Bay Whitebaiters Group	Rule 65(e)	Amend	Amend as follows: The placement or erection of any replacement whitebait stand in, on or over the bed of any lake, river or modified watercourse is a <u>permitted</u> activity provided the following conditions are met: (i) the original stand has been destroyed or it is necessary to move the stand due to natural alterations to the course of the river, bank erosion, or high water mark alterations; (ii) the replacement stand complies with the conditions in Rule 65(b); (iii) the replacement stand is erected a minimum distance of 20 metres from any existing stand; (iv) the replacement stand is located on the same river as the original stand, as close as practicable to the former site, <u>and the precise location of the replacement stand is supplied to Council prior to rebuilding</u> ; (v) the original stand is removed in accordance with Rule 65(e).
108.96	BYTHELL Jesse	Rule 65		I seek the addition of the following clause in Rule 65(e), ‘there shall be no damage or destruction of significant indigenous vegetation.’
210.90	Director-General of Conservation	Rule 65	Support in part	Retain Rule 65 (e)with the following amendment: <u>3. Consistency with the relevant Whitebait Fishing Regulations.</u>
279.100	Forest & Bird NZ	Rule 65	Support with minor amendments	Insert the words <u>“and their margins”</u> should be inserted throughout the proposed plan wherever provisions refer to the management of wetland, river and / or lake beds.
719.4	Sharp Trust	Rule 65	Support	Retain.
752.158	Southland Fish & Game Council	Rule 65	Support Amend	Retain and amend Rule 65(a) to include the following bullet point: <u>(iv) The stand and any associated structures (including huts and fences) situated over, in or on public land does not impede any legal access to the river.</u> And Amend Rule 65(a) to provide: Environment Southland will exercise its control over the following matters: 1. Any effects on <u>natural character and amenity values</u> , river morphology and dynamics (including erosion and deposition), public safety and public access, <u>aquatic and riverine ecosystems and habitats (including fish passage), the spiritual and cultural values and beliefs of</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>the tangata whenua, taonga species, historic heritage, landscape, navigational safety, and recreation values;</u></p> <p>– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things:</p> <p><u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
832.125	VAN GOOL Raewyn	Rule 65	Support	Retain.

#### Rule 66 – Maintenance of structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.97	BYTHELL Jesse	Rule 66		I seek the addition of the following clause in Rule 66(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
209.43	DIPROSE Dave	Rule 66	Support	Retain.
279.101	Forest & Bird NZ	Rule 66	Support with minor amendments	Insert the words <u>“and their margins”</u> should be inserted throughout the proposed plan wherever provisions refer to the management of wetland, river and / or lake beds.
372.24	Heritage NZ	Rule 66	Support in part Amend	Retain Rule 66(a)(vii).
449.33	KiwiRail Holdings Ltd (KiwiRail)	Rule 66	Amend	<p>Amend as follows:</p> <p>Rule 66 - Maintenance of structures</p> <p>(a) Unless otherwise stated in this Plan, the maintenance of any structure in, on, under or over the bed of any river, modified watercourse, or lake, and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ...</p> <p><del>(vii) there are no recorded historic heritage sites, at the site of the activity; ...</del></p>
523.11	MCGREGOR Grant	Rule 66	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
562.20	Meridian Energy Ltd	Rule 66	Oppose in part	Retain Rule 66(a). Amend Rule 66(b) to read: (b) Unless otherwise stated in this Plan, the maintenance and associated bed disturbance of any structure in, on, under or over the bed of any river, modified watercourse, or lake <u>or discharge resulting from the carrying out of the activity</u> that does not meet one or more of the above conditions of Rule 66(a) is a restricted discretionary activity.
614.28	NZ Transport Agency	Rule 66	Support Amend	(xii) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks <u>unless the structure is designed to cause deposition</u> ;
752.159	Southland Fish & Game Council	Rule 66	Oppose	– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things: <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u>
753.10	Southland River Liaison Committees	Rule 66	Support	Retain.
832.126	VAN GOOL Raewyn	Rule 66	Support	Retain.

### Rule 67 – Alteration and/or extension of structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.98	BYTHELL Jesse	Rule 67		I seek the addition of the following clause in Rule 67(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
372.25	Heritage NZ	Rule 67	Support in part Amend	Retain Rule 67(a)(x) and associated matter of discretion 1.
449.34	KiwiRail Holdings Ltd (KiwiRail)	Rule 67	Amend	Amend as follows: Rule 67 – Alteration and/or extension of structures (a) Unless otherwise stated in the Plan, the alteration or extension of any structure in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>provided the following conditions are met: ...</p> <p><del>(ii) the structure is not listed on the New Zealand Heritage List/Rarangi Korero, and was not constructed prior to 1920; ...</del></p> <p><del>(x) there are no recorded historic heritage sites, at the site of the activity; ...</del></p>
523.12	MCGREGOR Grant	Rule 67	Support	Retain.
562.21	Meridian Energy Ltd	Rule 67	Support	Retain.
614.29	NZ Transport Agency	Rule 67	Support Amend	<p>Rule 67 – Alteration and/or extension of structures</p> <p>(a) Unless otherwise stated in the Plan, the alteration or extension of any structure in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</p> <p>(i) the structure is lawfully established;</p> <p>(ii) the structure is not listed on the New Zealand Heritage List/Rarangi Korero, <del>and was not constructed prior to 1920;</del></p> <p>(iii) the alteration or extension shall not involve an increase in the number or area of any support structures in the bed of the river, modified watercourse, or lake;</p> <p>(iv) fish passage shall not be impeded as a result of the activity;</p> <p>(v) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(vi) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</p> <p>(vii) any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</p> <p>(viii) no fuel storage or machinery refuelling shall occur on any area of the bed;</p> <p>(ix) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p><del>(x) there are no recorded historic heritage sites, at the site of the activity;</del></p> <p>(xi) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(xii) all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(xiii) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</p> <p>(xiv) the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks <u>unless the structure is designed to cause deposition</u>;</p> <p>(xv) any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable; and</p> <p>(xvi) the structure shall be maintained in a state of good repair.</p>
752.160	Southland Fish & Game Council	Rule 67	Support Amend	<p>Retain Rule 67 as notified and amend Rule 67(a) to include the following bullet point:  <u>(xvii) The structure does not impede any legal access to the river, modified watercourse or lake.</u></p> <p>Amend Rule 67(b) to provide:  Environment Southland will exercise its control over the following matters:</p> <p>1. Any effects on river morphology and dynamics (including erosion and deposition) <del>of the river, modified watercourse or lake,</del> <u>public safety and public access, aquatic and riverine ecosystems and habitats (including fish passage),</u> the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, <u>landscape, navigational safety, and recreation values;</u></p> <p>– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things:  <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.11	Southland River Liaison Committees	Rule 67	Support	Retain.
832.127	VAN GOOL Raewyn	Rule 67	Support	Retain.

## Rule 68 – Demolition and/or removal of structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
372.26	Heritage NZ	Rule 68	Support in part Amend	Retain Rule 68(a)(viii) and associated matter of discretion 1.
449.35	KiwiRail Holdings Ltd (KiwiRail)	Rule 68	Amend	Amend as follows: Rule 68 – Demolition and/or removal of structures (a) Unless otherwise stated in this Plan, the demolition or removal of any structure in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: <del>(i) the structure is not listed on the New Zealand Heritage List/Rarangi Korero, and was not constructed prior to 1920; ...</del> <del>(viii) there are no recorded historic heritage sites, at the site of the activity; ...</del>
523.13	MCGREGOR Grant	Rule 68	Support	Retain.
562.22	Meridian Energy Ltd	Rule 68	Support	Retain.
614.30	NZ Transport Agency	Rule 68	Support Amend	Rule 68 – Demolition and/or removal of structures (a) Unless otherwise stated in this Plan, the demolition or removal of any structure in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: (i) the structure is not listed on the New Zealand Heritage List/Rarangi Korero, <del>and was not constructed prior to 1920;</del> (ii) fish passage shall not be impeded as a result of the activity; (iii) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel; (iv) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary; (v) any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation); (vi) no fuel storage or machinery refuelling shall occur on any area of the bed; (vii) no contaminants, other than sediment released from the bed, shall be discharged to

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p><del>(viii) there are no recorded historic heritage sites, at the site of the activity;</del></p> <p>(ix) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(x) all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</p> <p>(xi) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level; and</p> <p>(xii) demolition or removal of the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks.</p>
752.161	Southland Fish & Game Council	Rule 68	Support in part	<p>Retain.</p> <p>– In the Rule which create restricted discretionary activity status for activities that do not comply with the preceding permitted activity status in those, should be amended to provide that Council in exercising its discretion will consider, among other things:</p> <p><u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.12	Southland River Liaison Committees	Rule 68	Support	Retain.
832.128	VAN GOOL Raewyn	Rule 68	Support	Retain.

#### Rule 69 – Structures not covered by, or not complying with, rules

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
249.29	Ernslaw One Ltd	Rule 69	Support Amend	Make provision for installation of Woody Debris Traps (following forest harvesting) as a Controlled Activity, subject to regular inspection (within 5 days of a flood event), clean out (within 20 days of a flood event), maintenance and upkeep for 5 years after harvest and then require removal.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
562.23	Meridian Energy Ltd	Rule 69	Support	Retain.
614.31	NZ Transport Agency	Rule 69	Support	Retain.
752.162	Southland Fish & Game Council	Rule 69	Support	Retain.
753.13	Southland River Liaison Committees	Rule 69	Support	Retain.
832.129	VAN GOOL Raewyn	Rule 69	Support	Retain.

### Rule 70 – Stock exclusion from waterbodies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
1.4	A J & S R Currie Ltd	Rule 70	Oppose	Continue to offer grants when and where possible to encourage farmers to fence off their waterways – there is a cost whatever way you look at it but it is effective and possibly the only way to get near 100% stock exclusion.
3.8	A P & S M Verhaegh Ltd	Rule 70	Oppose	Equal requirements for all waterways required no matter what stock.
5.15	ADAMS A J & P G	Rule 70	Amend	The time frame should be extended out to 5-7 years.
11.8	Agribusiness Consultants Ltd	Rule 70		<p>Delete Rule 70, the Council should conduct research into the matters of bank stability before further rules around stock exclusion are created.</p> <p>The 2012/13 Recreational Waters report of Southland found Wildfowl and Plant decay “dominated” microbial source monitoring at sites sampled. We would support further research into faecal source studies that include Wildfowl and were conducted using indicator variables that correlated to the presences of faecal contaminants like ecoli.</p>
15.1	ALLAN Peter & Dianne	Rule 70	Oppose	<p>Amend Rule 70 to take into account current Farm Management Plan and environmental actions taken by the farm.</p> <p>Delete deer exclusion for Natural Wetlands.</p>
19.7	Allison Family Farms Ltd	Rule 70		Relax cultivation rules to allow stock access at certain times of the year.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.112	Aratiatia Livestock Ltd	Rule 70	Support	Retain.
25.34	Ardel Dairies Ltd	Rule 70	Amend	Remove requirements for stock exclusion in high country. Invest in point source testing on exit of farms and develop individual plans.
27.7	Arkley Farm Ltd	Rule 70		Amend to allow cattle and deer access to waterways if stocking density is under 12550/ha and the waterway is under 2m wide as long as no major environmental damage is observed.
31.11	AYERS Warren	Rule 70	Amend	Change width to 5 metres and slope to 5 degrees.
32.8	B D Farm Trust	Rule 70	Support Amend	Amend to exclude artificial waterways and provide for animal welfare, stock movement pattern and health & safety issues. Include a 'where practical' clause.
33.7	BACON V M	Rule 70	Oppose	Identify where I will fence off waterways in the Farm Environment Plan, Environment Southland Staff confirm that the areas I have identified and timeframes are appropriate. I implement my riparian plan without the need to a resource consent.
40.12	BAKER David	Rule 70	Amend	Exclude the small streams and creeks on the bedrock/hill country from having to be fenced. Exclude the very extensive low stocking rate properties from having to be fenced. Extend the dead line to fence deer out of waterbodies until 2025. Clarify the distance from the waterbody to be fenced is 3 metres.
42.6	BAKER Rory	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
47.24	Balfour, Wendonside & Waikaia Group	Rule 70	Support Amend	Oppose the compulsory fencing of waterways in the bedrock/hill country where the land is extensively farmed by sheep and cattle.
49.5	BARCLAY Todd (Member of Parliament – Clutha Southland)	Rule 70	Oppose in part	I support the removal of sheep from the stock exclusion rule.  I oppose the requirement to exclude stock from waterways on extensive hill and high country farms. The benefits to water quality from excluding stock from waterways on these farms (which can be characterised by a low stocking rate per hectare) is questionable and, given the huge costs associated, cannot be justified. A cost-benefit analysis for this requirement has not been appropriately undertaken.
54.16	Bayswater Dairy Ltd	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
56.7	BEATTIE Michael &	Rule 70	Oppose	A longer timeframe is required to fence out waterways before consents are needed. Where

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Lynley			farms have low stocking rates no fences should be required around waterways for beef cattle.
61.1	BEE Peter	Rule 70	Amend	Include in Rule 70 a maximum cattle stocking rate where access to waterways is permitted.
62.13	Beef + Lamb NZ	Rule 70	Oppose Amend	<p>Amend Rule 70 to read:</p> <p>(a) The disturbance of the bed of <del>surface waterbody a lake, river, natural wetland, artificial watercourse or modified watercourse</del> by stock and associated discharge through access by stock is a permitted activity provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(i) there is no discharge that gives rise to any conspicuous change in the colour or visual clarity in the receiving water;</li> <li>(ii) there is no significant de-vegetation of the bed and banks, pugging, or alteration to the profile of the bed and banks, other than at fords or stock crossings;</li> <li>(iii) there is no access by stock to roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</li> <li>(iv) <del>there is no access by stock to the area of tidally influenced river and adjacent riparian habitat;</del></li> <li>(v) where a dedicated stock crossing point or ford is used, condition (ii) above may be disregarded, provided the crossing point is not more than 20 metres wide and aligns with a constructed track or raceway on either side of the crossing point;</li> <li>(vi) despite (i) to (v), stock (excluding sheep and deer), are to be excluded from 1 May 2025<del>18</del> from <del>surface waterbodies</del> <del>all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite Marine Terraces, Gleyed, Oxidising, Old Maitara, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone, from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes</del> where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(vii) despite (i) to (v), deer are to be excluded from 1 May 2030<del>20</del> from <u>surface waterbodies</u> <del>:- rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes</del> where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.</p> <p><u>(viii) A Farm Environment Plan has been prepared in accordance with Appendix N that shows how the stock exclusion required by conditions (vi) and (vii) of Rule 70(a) will be achieved.</u></p> <p>(b) The disturbance of the bed of a <u>surface waterbody</u> <del>lake, river, natural wetland, artificial watercourse or modified watercourse</del> by stock and associated discharge through access by stock, that does not meet one or more of conditions (vi) and (viii) of Rule 70(a) is a discretionary activity, <del>provided the following conditions are met:</del></p> <p>(i) <u>a Riparian Management Plan has been prepared in accordance with Appendix N that shows how the stock exclusion required by conditions (vi) and (vii) of Rule 70(a) will be achieved by 1 January 2025 and is implemented.</u></p> <p><del>(c) The disturbance of the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse and associated discharge through access by stock that does not comply with conditions (i) - (v) of Rule 70(a) or Rule 70(b) is a non-complying activity.</del></p>
67.5	Benmore Downs Ltd	Rule 70	Oppose	No specific decision requested.
71.3	Beulah Organics NZ (BONZ)	Rule 70	Oppose	Delete.
73.15	BLACK Family Trust	Rule 70	Support	Retain but ensure open waterways are not permanently fenced on both sides.
79.9	BLAIR Phillipa Mary	Rule 70	Oppose	Fencing waterways below 4° slope. Once the farm has a water scheme in place as can be afforded.
80.20	BLAKELY Barney & Stephanie	Rule 70	Amend	Remove restrictions in high country.

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81.24	BLAKELY Hamish & Hannah	Rule 70	Oppose Amend	Support exclusion of sheep but remove requirement for all stock in hill and high country.
83.7	BOKSER Greg	Rule 70	Support Oppose	Oppose rule relating to cattle on land sloping less than 16 degrees. Support the rule that does not exclude cattle on land sloping greater than 16 degrees. Support rule relating to sheep not being part of the exclusion. Amend (a)(vi) and (vii) to 2025 to align to NPS-FM. Amend (a)(vi) and (vii) to encourage exclusion where practical along with farm management plans. Remove the reference to a 20 metre width.
84.6	BOLE Will	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
88.6	BRAITHWAITE Nathan	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
89.36	BRENTLEIGH Family Trust	Rule 70	Amend	Support sheep exclusion and oppose extensive hill and high country farmers being required to exclude stock.
91.6	Bridesdale Farming	Rule 70	Oppose	The rule needs clarified to identify the exclusion distance. The exclusion distance be less than 20metres for manmade and artificial waterbodies. A more practical distance is required. If an exclusion area is calculated it needs to take into consideration other factors such as riparian planting. Riparians need to be such that maintenance be carried out around culvert ends.
93.7	Broadacres Ltd	Rule 70	Amend	Amend (a)(vi) to 2025 to align to NPS-FM and amend (a)(vi) and (vii) to encourage exclusion where practical along with Farm Management Plans. Remove the reference to a 20 metre width.
99.12	BUCKINGHAM Greta	Rule 70	Oppose	Fencing Deer and Cattle from 95% of waterways below 4°slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at the catchment limit setting process. Once a farm had a stock water scheme in place 100% of waterways below 4° should be fenced and higher risk waterways above that could become the focus in collaboration with the Land Sustainability Team.
100.5	BUCKINGHAM Janette	Rule 70	Oppose	Replace with farmer best practice system.
101.13	BUCKINGHAM Thomas	Rule 70	Oppose	Fencing deer and cattle from 95% of waterways below 4 degrees' slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at

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				the catchment limit setting process. Once a farm had a stock water scheme in place 100% of waterways below 4 degrees should be fenced and higher risk waterways above that could become the focus in collaboration with the land sustainability team.
102.7	Burwood Station Ltd	Rule 70	Clarify	Remove date and have it in the Management Plan requirements.
105.3	BYARS Jeremy	Rule 70	Support	I support the exclusion of sheep from being fence out of waterways.
107.6	BYARS Richard	Rule 70	Oppose	Exclude stock in winter only so temporary fences can be used.
108.99	BYTHELL Jesse	Rule 70	Support	I seek clarification on the definition of 'significant' regarding clause (a)(ii). I also think the deadline of January 2020 for completing a Riparian Management Plan as required by 70(b)(i) is too long and seek that this deadline be reduced.
109.6	C F L Farms Ltd	Rule 70	Oppose	Fencing of waterways should be an incentive based matter, e.g. rates reduction.
115.2	CALVERT Paul	Rule 70	Support	Retain.
116.5	CAMPBELL Jenny	Rule 70		Fencing on sheep properties should be encouraged.
118.11	Carmyllie Farm	Rule 70	Oppose	No requirement for exclusion of stock from waterways on land with a slope of greater than 16degrees. No requirement for exclusion of sheep from waterways. Should there be a stock intensity limit for the requirement to exclude stock from waterways? e.g. if stock rate is less than x/ha, stock exclusion is not required. Issues regarding maintenance of fenced waterways. Should there be an allowance for designated, fenced drinking areas? Fencing off rivers that are allowed to change course because of build-up of gravel beaches and banks is it possible to keep stock out of those areas? Fencing off a river then to have it smashed by a flood in time, who pays for the damage of fence and the land that its taking after each flood? Drinking areas should be allowed for sheep as long as there isn't a big percentage of slope into it and at a low stocking rate per ha.
119.4	Carnie Farms	Rule 70	Oppose	Support that sheep are excluded from the rule. Delete cattle exclusion from 2018. Requires more discussions regarding hill country and sloping contour options.
125.4	CHARTRES Peter	Rule 70(vi)&(vii)	Oppose	Delete.
133.11	Civil Tech Ltd	Rule 70(a)(vi) and (vii)	Amend	Stock should be able to cross waterways and not require bridges or culverts if intermittent. Crossing of dairy cows every day may not be acceptable but 1 or 2 days in a 20 day period should not be a problem.
135.6	CLARKE A W & T M Partnership	Rule 70	Amend	Farmers should be given to 2025 to achieve this without a consent process and the huge costs involved. This process must take into account what a farmer may have achieved in protecting waterways on their farm in previous years. Within a farm management plan a farmer can

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				clearly show how he/she plans to protect their waterways using the financial and physical resources available in the best and most effective way.
136.4	CLARKE Alanna	Rule 70	Oppose	Delete Rule 70 (a)(i).
139.7	CLARKE David	Rule 70	Oppose	Delete Rule 70 (a)(i).
150.6	CLIFFORD Mervyn & Judy-Ann	Rule 70	Support Oppose	Support parts of Rule 70 – that sheep are not part of this rule and that it does not include cattle and deer on high country greater than 16 degrees but ES extend this timeframe to at least five to six years. Farmers, where practical, will use fencing. I would like ES to use the rule as guidelines for good farm management practices.
152.27	Clover Bell Ltd	Rule 70	Support	Retain.
153.4	Coalbrook Partnership	Rule 70	Oppose	Allow more time to fence off these areas.  Where beef herds only comprise a small percentage of the stock on a farm (i.e. if stocking rate is less than x/ha) then stock exclusion is not required.  Allow cattle in fenced off areas at specific times of the year.  In areas where there is no reticulated water supply there has to be provision for stock to have access to water.
155.9	Coasthaven Farms Ltd AND Paterson Gavara Trust	Rule 70	Support in part Amend	To allow a minimum of 5 years to fence all waterways and monitor this through the Land & Water Management Plan rather than regulation.
156.13	COCKBURN Grant & Rachel	Rule 70	Support	Clarify how the large scale extensive activities, where some land under 16 degrees is impractical to fence, will be dealt with under the proposed L&W Plan.
158.7	Colin Woodrow Ltd	Rule 70	Oppose	I would like ES to change this rule in the hill country physiographic zone. I would like to be allowed to have cattle access to water ways in the hill country if you have less than 25% cattle to sheep ratio, as well as having a visit from a Land Sustainability Officer to discuss a water way management plan.
159.5	COLLING Leigh	Rule 70	Oppose	Timeline needs to be extended as in the current financial environment it is not affordable.
164.4	Conlan Farming	Rule 70	Support	Retain. BUT

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				Need an area for stock to drink if water scheme breaks or no water scheme on block.  If not allowed to farm fenced off areas who is going to maintain this as not subsidised like other counties?
167.3	COPLAND M C & S	Rule 70	Oppose	We support excluding the fencing of sheep from the waterways. We oppose the fencing off of small tributary's on hill country farms to keep cattle out, that are stocked at very light rates over vast acreages. Exclude this from the Rule.
170.2	CORCORAN Martin Peter	Rule 70	Support	Retain.
172.19	COWAN Les & Christine	Rule 70	Amend	Sheep grazing is not intensive and should be allowed for weed control.
173.7	COWIE Martin	Rule 70	Oppose	Fencing deer and cattle from 95% of waterways below 4° slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at the catchment limit setting process. Once a farm had a stock water scheme in place 100% of waterways below 4° should be fenced and higher risk waterways above that could become the focus in collaboration with the Land Sustainability Team.
175.7	CRACK Stephen	Rule 70 (a)(vi)(vii)	Oppose	Should be noted that sheep will always be allowed near waterways as they reduce bank erosion and keep waterways clear. Light grazing of other animals also has little effect.
179.8	CROOKS Jonathan Ross & Sarah Jane	Rule 70		Rule 70(vi) - We suggest that instead of the exclusion of all beef cattle that farmers can be permitted to have access to waterways for beef cattle if effects are proven to be mitigated. For example, low stocking rates of beef cattle within paddocks would significantly manage contamination effects.  Rule 70(b)(i) - We suggest that a better approach to riparian management will be allowing a farmer to prove implementation of some riparian improvements on an annual basis with no final timeframe on achievement.
183.6	CUTHBERTSON John	Rule 70	Amend	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
184.6	CUTHBERTSON Shane	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality. Due diligence should be from economic, social & cultural view points



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189.44	Dairy Holdings Ltd	Rule 70		Ensure that Rule 70 does not require re-fencing of existing waterbodies.
191.12	DALE J M & K B	Rule 70	Oppose	Sheep and deer should be included in these exclusions.
192.16	DALE P T & S B Trust	Rule 70	Oppose	This can only happen where practical – e.g. exemptions in the high country. ES cannot classify all stock to be excluded. Riparian planting should not be a forced cost on farmers. Fenced waterways also need managed for excess growth and weed control – good management practices should be able to be applied. No comment on the timelines as I think ES need to consult with farming industry bodies and farmers to how it would be best to deal with waterways first.  Rule 70(vii) - Measurement should be taken from the edge of the bank and not in the waterway. Bank height severely disadvantages degree gradient.
194.6	Davie Justin	Rule 70	Oppose	Cattle do a much better job of cleaning up rank grass and weeds than sheep. Should at least have provision in rules for low intensity grazing of riversides etc. by cattle over the summer months. Also can't expect to enforce full fencing of waterways so quickly as it comes at a considerable cost to farmers, some much more than others depending on farm location.
196.5	DE BOER Frido	Rule 70	Oppose	Exclude cattle from waterways in intensive land use situations but allow it for extensive land use.
198.7	DIACK Hugh	Rule 70	Oppose	Amend Rule 70(a)(i) to allow for temporary changes in the colour of visual clarity in the receiving water. Amend the rule to allow for cattle assessing waterways where they are farmed on the same landholding and in conjunction with sheep e.g. If farmers have less than 30% total stock units in cattle (70% Sheep) on their property and have them in small mobs (no more than 30). Amend Rule 70(a)(vi) to allow for more time for fencing to be undertaken. A date closer to when Council are expecting this process to be over (2023) should be used.
199.3	DICKIE Alan & Valerie	Rule 70	Support	Retain.
200.7	DICKIE Alton Brent	Rule 70	Oppose	Amend (a) (vi)& (vii) to 2025. Amend (a) (vi) & (vii) to encourage exclusion where practical along with Farm management plans. Remove the reference to a 20 metre width.
202.4	DICKSON Brent Gordon	Rule 70		That the fencing of waterways be driven by the water quality coming off the farm. If the quality is good with low P N and E/colia levels and over time remains good, fencing of that local catchment should not be deemed necessary. This may be based on regular standardised water tests say quarterly.
203.4	DICKSON Bruce John	Rule 70		That the fencing of waterways be driven by the water quality coming off the farm. This may be based on regular standardised water tests say quarterly.

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204.7	DICKSON Grant	Rule 70	Oppose	Amend (a) (vi) & (vii) to encourage exclusion where practical along with Farm management plans. Remove the reference to a 20 metre width.  Amend (a) (vi) & (vii) to 2025.
205.32	Dillon Ag Ltd (Chris Dillon)	Rule 70	Amend	Support exclusion of sheep. OPPOSE extensive hill and high country farmers being required to exclude stock.
206.32	Dillon Ag Ltd (Rochelle Dillon)	Rule 70	Amend	Support exclusion of sheep. OPPOSE extensive hill and high country farmers being required to exclude stock.
209.44	DIPROSE Dave	Rule 70	Oppose	Need clarification of water way and what waterways could be included, excluded from stock exclusion.
210.91	Director-General of Conservation	Rule 70	Support in part	<ol style="list-style-type: none"> <li>1. Include the requirement to exclude sheep from waterbodies on land in particular on flat to moderately steep land (Classes 1-iV) by 1 May 2020.</li> <li>2. Prohibit supplementary feeding on lake or river beds.</li> </ol> Prohibit stock in wetlands after 2022.
212.4	DODD N R & J L	Rule 70	Support Oppose	More of a practical proposal be adopted in conjunction with farer/land owner discussion.
213.2	DODDS Geoffrey	Rule 70	Amend	Better option would be to fence just trouble spots by electric fencing when bigger mobs in paddocks.
214.17	Donald Farm	Rule 70	Oppose	Delete Rule 70(a)(i).  Rule 70(a)(ii) - The drainage team in Environment Southland advocate in favour of sheep being allowed to graze stream banks.
222.4	DUFF Bradon	Rule 70	Support in part	Support land over 16 degrees need not be fenced. Support sheep are excluded from Rule 70. Oppose cattle not being excluded.
223.3	DUFF Farms	Rule 70	Oppose	No specific decision requested.
225.6	DUGDALE Peter	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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233.29	DYSON Valerie &Glyn	Rule 70	Support	Retain.
242.2	ELDER Hamish	Rule 70	Oppose	I do not like there has to be a complete exclusion of cattle from all waterbodies under 16 degrees slope. I do like that sheep have been excluded from this plan, thank you. An alternative to fencing all waterways could be the use of temporary fencing when a stoking rate threshold is exceeded in an area. Similar to the winter grazing rules. If permanent fencing of waterways is required than maybe those that are going to benefit from the improved water quality such as Fish and Game could help subsidise the cost.
243.6	ELS Luren	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until good management practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
247.21	Environment Southland	Rule 70	Amend	Amend Rule 70(iv) to read: (iv) there is no access by stock to the <u>tidal river habitat up to the spring tide level</u> <del>area of tidally influenced river</del> and adjacent riparian habitat;
249.30	Ernslaw One Ltd	Rule 70	Support Amend	Amend footnote 9 to Rule 70 to note that: - distance is to be <u>measured horizontally</u> , not as slope distance, and be measured <u>back from the top of the bank of the bed of the river or stream</u> , - Add diagrams be added to show how slope should be measured.  Refer to diagrams in submission produced for illustrating prescribed planting setback distances for the proposed Forestry NES.
250.8	ESLER Lloyd	Rule 70		Retain.
253.6	EVANS Frederick & BROCKMAN Carla	Rule 70	Support in part Amend	Prioritise most effective fences in our Farm Management Plan and proceed methodically through the various stages over time. Each farmer to implement a riparian plan suitable to gain desire results at an achievable cost on his/her farm. A rational, case by case approach with costs reasonable to benefits gained.
254.4	EVANS Harold	Rule 70	Oppose	If stock are easily kept out of the water way due to topography this should not require any fencing. Flood zones have not been considered and are not appropriate to fence.
255.3	EVANS Mark	Rule 70	Oppose	Give us a more realistic timeframe for fencing cattle from waterways, and have it so that it could be done with temporary fencing considering how cost prohibitive it will be.
257.5	EVANS O R & T D	Rule 70	Amend	ES staff work with farmers to assess individual farming operations.

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258.21	Eyre Creek Ltd	Rule 70(vii)	Support in part	Access to waterways by deer should be a permitted activity adopting good management practise. Purpose built wetlands at the outlet of the farm which act as a filter for the surface water body before it enters tributaries could be a tool to mitigate adverse water quality IF it is proven that the stock are causing any adverse effects.
260.3	Fairlight Station Ltd	Rule 70	Amend	Amend to consider stocking rate on extensive operations. Sixteen-degree Rule should be considered on an average per block, or farm system, not in isolation in a small area on an extensive farming system.
263.2	Fallow Valley Ltd	Rule 70	Amend	Amend to be able to graze in the dry months.
265.102	Federated Farmers of NZ (Southland Province)	Rule 70	Support in part	<p>Amend as follows:</p> <p>(a) The disturbance of the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse by stock and associated discharge through access by stock is a permitted activity provided the following conditions are met:</p> <p>(i) there is no discharge that gives rise to any conspicuous change in the colour or visual clarity in the receiving water;</p> <p>(ii) there is no significant de-vegetation of the bed and banks, pugging, or alteration to the profile of the bed and banks, other than at fords or stock crossings;</p> <p>(iii) there is no access by stock to roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(iv) there is no access by stock to the area of tidally influenced river <del>and adjacent riparian habitat;</del></p> <p>(v) where a dedicated stock crossing point or ford is used, condition (ii) above may be disregarded, provided the crossing point is not more than 20 metres wide and aligns with a constructed track or raceway on either side of the crossing point;</p> <p>(vi) despite (i) to (v), stock (excluding sheep and deer) are to be excluded from 1 May 2018 from: all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes <u>that are permanently flowing or at least 1m wide and 30cm deep, where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees in the Peat Wetlands, Lignite Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone, from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.</u></p>

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				<p>(vii) despite (i) to (v), deer are to be excluded from 1 May 2020 from: rivers, natural wetlands, artificial watercourses, modified watercourses and lakes <u>that are permanently flowing or at least 1m wide and 30cm deep, where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.</u></p> <p><u>(b) despite rule 70(a):</u></p> <p><u>(i) hill and high country farms are excluded from the stock exclusion requirements when the stocking rate is 5 stock units per hectare or less;</u></p> <p><u>(ii) stock may access waterbodies, if this is the only source of stock drinking water.</u></p> <p><del>(bc)</del> The disturbance of the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse by stock and associated discharge through access by stock, that does not meet one or more of conditions (vi) and (vii) of Rule 70(a) <u>or 70(b)</u> is a discretionary activity provided the following conditions are met:</p> <p>(i) a Riparian Management Plan has been prepared in accordance with Appendix N that shows how the stock exclusion required by conditions (vi) and (vii) of Rule 70(a) <u>or 70(b)</u> will be achieved by 1 January 2025 and is implemented.</p> <p><del>(cd)</del> The disturbance of the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse and associated discharge through access by stock that does not comply with conditions (i)-(v) of Rule 70(a) or Rule 70(b) <u>or Rule 70(c)</u> is a non-complying activity.</p>
268.4	Fermoy Holsteins Ltd	Rule 70	Amend	Amend the rule to include deer in low country physiographic zones from May 2018 in line with other livestock.
277.55	Fonterra Co-operative Group Ltd	Rule 70	Oppose in part	<p>Amend parts (vi) and (vii) of Rule 70 to read –</p> <p>“(vi) despite (i) to (v), stock (excluding sheep and deer) are to be excluded from 1 May 2018 from: <u>natural wetlands, lakes, and the active beds of all rivers, artificial watercourses and modified watercourses</u> in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone, from <u>natural wetlands, lakes, and the active beds of all rivers, artificial watercourses and modified watercourses</u> where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.</p> <p>(vii) despite (i) to (v), deer are to be excluded from 1 May 2020 from: <u>natural wetlands, lakes,</u></p>

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				<p><u>and the active beds of all rivers, artificial watercourses and modified watercourses in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Matura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone natural wetlands, lakes, and the active beds of all rivers, artificial watercourses and modified watercourses where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.”</u></p>
279.102	Forest & Bird NZ	Rule 70	Support with amendments	<p>Amend Rule 70 as follows:</p> <p>(a) The disturbance of the bed of a lake, river, natural wetland, <u>estuary or lagoon</u>, artificial watercourse or modified watercourse by stock and associated discharge through access by stock is a permitted activity provided the following conditions are met:</p> <p>(i) There is no discharge that gives rise to any conspicuous change in the colour or visual clarity <i>or</i> <u>sedimentation</u> in the receiving water;.....</p> <p>(v) Where a dedicated stock crossing point or ford is used, condition (ii) above may be disregarded, provided the crossing point is not more than 20 metres wide and aligns with a constructed track or raceway on either side of the crossing point <u>and there is no:</u></p> <p>(1) <u>Existing structure available for use; and</u></p> <p>(2) <u>Discharge that gives rise to any conspicuous change in the colour or visual clarity or sedimentation in the receiving water; and</u></p> <p>(3) <u>Slumping, pugging or erosion of the banks.</u></p> <p><u>Amend Rule 70 to provide that stock crossing points for stock listed in Rule 70(a)(vi) and (vii) must be bridged or culverted.</u></p> <p>Insert new bullet point in Rule 70(a).</p> <p><u>“(vi) There is no feeding out or supplementary feeding of stock in, over or on the bed of a lake, river, natural wetland, estuary or lagoon, artificial watercourse or modified watercourse and their margins.”</u></p> <p>Amend Rule 70(a)(vii) as follows:</p> <p>(vi) despite (i) to (v), <u>all dairy stock stock (excluding sheep and deer)</u> are to be excluded from 1 <del>May 2018</del> <u>1 June 2017</u>; and all stock (excluding sheep and deer) are to be excluded from 1 May 2018 from: <u>all headwater seeps / springs, tarns, intermittent / ephemeral streams with an</u></p>

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				<p><u>active bed wider than 1 metre</u>, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes <u>and estuaries and lagoons</u> in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Matura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre</u>, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees.</p> <p>(vii) despite (i) to (v), deer are to be excluded from 1 May 2020 from: <u>all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre</u>, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes <u>estuaries and lagoons</u> in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Matura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre</u>, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees.</p> <p>Insert new Rule 70(a)(viii), (ix) and (x) as follows:</p> <p><u>(viii) despite (i) to (v) sheep are to be excluded from 1 May 2020 from: all natural wetlands in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Matura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all natural wetlands where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees in the following catchments.</u></p> <p><u>(ix) despite (i) to (v) sheep are to be excluded from 1 May 2024 from: all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Matura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees in the following catchments:</u></p> <ol style="list-style-type: none"> <li>(1) <u>Otautau Stream;</u></li> <li>(2) <u>Waikouro Stream; and</u></li> <li>(3) <u>Winton Stream.</u></li> </ol>

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				<p><u>(x) In relation to stock exclusion requirements set out in (vi) to (ix) a vegetated strip is to be maintained, and stock excluded from, the outer edge of the bed of all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes for a distance of:</u></p> <p>(1) <u>5 metres measured horizontally from the outer edge of the bed on land within a slope of less than 4 degrees (flat); and</u></p> <p>(2) <u>10 metres measured horizontally from the outer edge of the bed on land within a slope between 4 and 16 degrees (rolling).</u></p> <p>(b) The disturbance of the bed of a lake, river, natural wetland, <u>estuary or lagoon</u>, artificial watercourse or modified watercourse by stock and associated discharge through access by stock, that does not meet one or more of conditions (vi) and (vii) of Rule 70(a) is a discretionary activity provided the following conditions are met:</p> <p>(c) The disturbance of the bed of a lake, river, natural wetland, <u>estuary or lagoon</u>, artificial watercourse or modified watercourse and associated discharge through access by stock that does not comply with conditions (i)-(v) of Rule 70(a) or Rule 70(b) is a non-complying activity.</p>
280.2	Forward Holdings Ltd	Rule 70		Amend so that Rule 70 is not “one size fits all”.
286.5	Frew Farming Ltd	Rule 70	Support	Support sheet exclusion.
290.4	G A Young & Co Ltd	Rule 70	Oppose	ES needs to show some leadership here and not require fencing of waterways on extensive low intensity farming systems. Both stocking intensity and magnitude of waterways on properties could be used to allow exemptions here. Effects based outcomes are once again the indicator of what needs to be achieved.
291.6	G J Gardner	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
292.17	G S & M A Clearwater Ltd	Rule 70	Amend	In extreme weather events there is always a conspicuous change in the colour of receiving water regardless if livestock are present or not. Amend to allow for this.



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293.4	GAMBLE S W & J M	Rule 70		Stock exclusion – delete fencing requirements for hill country farms.
294.5	Gardyne Agriculture Ltd (Duncan Gardyne)	Rule 70	SupportOppose	Oppose planned setbacks from waterways as where is the evidence these buffer zones are effective? Is 3 metre rule not sufficient? Support allowing sheep to graze beside waterways to help keep broom, gorse etc. under control (make it easier for recreational fishermen).
295.5	Gardyne Agriculture Ltd (Fred Gardyne)	Rule 70	Support Oppose	Delete buffer setbacks from waterways and retain allowance for sheep to graze beside waterway.
298.8	GARDYNE Joanne	Rule 70	Oppose	Hill country farmers do not need to fence creeks if they have a stocking rate of less than 5su per ha.
299.20	GARDYNE John	Rule 70	Oppose	Support sheep being not excluded from waterways they do a good job on weeds and stop bank erosion. Hill country should not have to exclude stock if the stocking rate is below 6su/ha.
303.2	Garfield Farm Ltd	Rule 70	Support	Sheep being kept away from waterway from May 1 <sup>st</sup> to September 1 <sup>st</sup> and allowed to graze for rest of year. Make a decision on stock and stock classes to waterways.
305.3	GERRARD L J & J A	Rule 70	Amend	All stock fencing around a waterway (except for deer and sheep) should be a minimum of two wires permanent fencing.
310.4	GILL Greg & Liz	Rule 70	Oppose	We agree that fencing off waterways is good practice but your timeframe is too short. There is a large cost involved in erecting these fences which for the average farmer is too much in one go.  As long as the rule stays at fencing off waterways without a large buffer zone then we are happy to do this. If you make us include large buffer zones on slopes then we very much disagree with this rule. This is permanent fencing of waterways rather than temporary fencing of waterways during winter grazing that we are talking about.
311.3	GILL Murray John	Rule 70	Oppose	To let deer, beef cattle and sheep to be farmed in these areas provided it is not intensively grazed. The stocking rate is the key to the impact that the stock have.
312.6	GILLESPIE David	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural viewpoints
316.5	Glenaffric Partnership	Rule 70	Oppose	Support sheep being excluded from the rule however oppose that cattle need to be kept out of all waterways.

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317.3	Glenaray Station (W Pinckney Ltd)	Rule 70	Oppose Amend	Delete 70(a) (vi) and (vii).  Rule 70(b) and (b)(i) - Remove references to clauses 70(a)(vi) and (vii). Replace with references to clauses 70(a) (i) to (v).
323.4	Glenshe Trust	Rule 70	Amend	Stock exclusion from waterway is not required if stocking rate is less than 4 su/ha.
332.4	GRANT Robert	Rule 70	Oppose	Delete and provide a realistic and practical ruling for profitable farming.
334.6	Greenvale Station Ltd	Rule 70	Amend	These vary in size depending on the time of year and should account for duck ponds.
336.6	GRIMM Hamish	Rule 70		Sheep should not be excluded from direct contact during the summer grazing period to control weeds which abound in these areas. Winter grazing restrictions are sufficient.
338.2	GUNN Graeme	Rule 70	Support Amend	Watercourse must be defined as permanently flowing before they are required to be fence.
340.4	Gunton Farms Ltd (Mark Gunton)	Rule 70	Oppose	Enable grazing of flood-prone areas and rolling hill country tributaries.
341.11	Gunton Farms Ltd	Rule 70	Amend	The use of crossing streams/rivers in bedrock hill country zone is permitted provided water discolouration does not occur for prolonged periods of time!!
344.7	Hall Ag Ltd (Glenda Hall)	Rule 70	Oppose in part	Limit setback to 3M.  Retain no stock exclusion for sheep.
345.7	Hall Ag Ltd (John Hall)	Rule 70	Oppose in part	Limit setback to 3M.  Retain no stock exclusion for sheep.
348.8	HAMILTON Blair	Rule 70(vii)	Amend	1 <sup>st</sup> May 2020 exclude all deer from a watercourse. Clarify if this includes wild deer?
355.13	HARRIS David	Rule 70	Amend	The rule needs to include Alpine zones and have setbacks at least the same as those listed for cultivation in rule 25
365.10	HEENAN M D and D W	Rule 70	Amend	Amend the rule to provide practical solutions for stock crossings in these circumstances.  Amend the rule to provide a staggered approach to stock exclusion. Start with requiring major waterbodies such as rivers to be excluded by 1 May 2018. Then stagger the exclusion between 1 May 2018 and 1 May 2025 of all other waterbodies by either a percentage to be completed

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				per year, or by the waterbodies that in terms of meeting water quality standards need fencing.  Clarity on the width of waterbodies that need to be fenced also needs to be included, either within the rule, or within an appropriate definition, and should not include waterbodies with a width below one metre.
375.5	Hillview Trust	Rule 70	Support	Retain.
386.16	Hopcroft Farms Ltd	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
389.8	HORRELL P J & J M	Rule 70	Support	Support excluding sheep from rule 70 but consider allowing Farm Management Plans (not resource consent) as a more flexible approach to riparian management on extensive sheep and beef properties.
391.5	HOWE M A & B J	Rule 70		Common sense from both parties here is all that is needed.
392.4	HOWE Peter	Rule 70	Amend	Amend to exclude requirement for farms with a low stocking rate of cattle.
402.19	HUNT Alistair & Bernadette	Rule 70	Amend	Retain the exclusion of sheep and retain the slope of 16 degrees or more. Amend the rule to add an exclusion for extensive hill and high country farms with a stock rate of 5 stock units per hectare or less.  Amend the rule to allow access by stock to waterways until 2020 if no other source of stock drinking water is available.  Amend rule to state that waterways for stock exclusion should be permanently flowing or a t least 1m wide and 30cm deep.
406.2	HUTTON Sue	Rule 70	Oppose	More research done before rules are implemented.
407.6	HYLAND Maureen	Rule 70	Oppose	Delete all references to Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Do due diligence on economic, social and cultural values.
421.5	JAMES S T & K A Family Trust	Rule 70	Support	Support the “no requirement for sheep in waterways” but suggest three metre buffer zone for all setbacks.
424.6	JARVIS Ben	Rule 70	Oppose	No specific decision requested.
425.7	Jedburgh Station Ltd	Rule 70	Support	Beef cattle to be managed as sheep are, by means of a Farm Environment Plan (FEP). Hill country farming of beef cattle should be managed under and FEP NOT by annual resource consents.
429.6	JOYCE Nathan J & Julie L	Rule 70	Support	Retain sheep being excluded from the stock exclusion but I oppose there being any degree of

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			Oppose	gradient, when this rule is being imposed for all year round – it isn't clear if it is or not.
433.11	Kapuka Dairies Ltd	Rule 70	Oppose	If sheep are excluded for what reason I am unaware so should young stock from aged 0-12 months old. Physiographic zones have a huge impact on available grazing – whether it be young or mixed age cows. I propose that this rule needs further evaluation as this yet again is coming under the blanketing rule. What implications will this have on Southland farming and the “wellbeing” of our communities.
434.6	Kauana Dairy Ltd & Taffy Ltd	Rule 70	Amend	Amend timeframes.
438.8	KENNEDY John	Rule 70	Support	Sheep and deer need to be excluded from waterways as of 1/5/2018. There has been ample time to complete fencing and also to construct reticulated water systems for these classes of stock.
444.6	KING Henry	Rule 70		This must be farm specific, with sensible guidelines. This is unworkable and unfair to anyone who has a main mountain fed river running through it.
446.4	KINGSBURY Grant	Rule 70	Oppose	Remove requirement that ‘all’ areas must be fenced off as a blanket rule.
450.6	Kmore Farming Ltd	Rule 70	Amend	Amend to 100 metres from lake or wetland i.e. ponds (ponds are excessive) and clarify if electric fences around waterways okay in fodder crops.
452.3	KNOWLER John & Wendy	Rule 70	Oppose	Allow sheep access to some waterways.
453.5	KNOWLER Rohan	Rule 70	Support	Retain.
460.4	LAIDLAW Graham	Rule 70	Oppose	No specific decision requested.
461.9	LAMB Bruce & Gaye	Rule 70	Oppose	Amend fencing deer and cattle from 95% of waterways below 4 degrees' slope. Once a farm had a stock water scheme in place 100% of waterways below 4 degrees should be fenced and higher risk waterways above that could become the focus in collaboration with the land sustainability team.
462.2	LAMB George	Rule 70	Support	Support that sheep should be left out of waterways.
463.4	LAMB Greg	Rule 70		Agree sheep should be excluded from this rule. Agree land over 16 degrees, 20 metres from a waterway need not be fenced. Object that land less than 16 degrees should be fenced from cattle.
464.29	Landpro Ltd	Rule 70	Support Amend	We seek that council exercise discretion on a case by case basis of which properties may be required to fence their waterways and which properties it is too impractical or costly. We also request that security is given to those farms which have currently fenced waterways.

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465.4	Lankirk Trust	Rule 70	Amend	<p>The rules should be redrafted so that:</p> <ul style="list-style-type: none"> <li>• Small and ephemeral waterways are excluded from the fencing requirements</li> <li>• Land with a low stocking rate (especially of cattle or deer) is excluded from the fencing requirements</li> <li>• There is the option to offset some of the fencing requirements by creating areas of wetlands, sediment ponds etc. which would mitigate the risk of sediment loss or water contamination.</li> </ul> <p>Set more achievable targets e.g.</p> <ul style="list-style-type: none"> <li>- 25% of waterways fenced by 31 Dec 2025</li> <li>- 50% of waterways fenced by 31 Dec 2030</li> <li>- 80% of waterways fenced by 31 Dec 2035.</li> </ul>
467.7	Lawrence Farms Ltd (Gavin Lawrence)	Rule 70(vii)	Oppose	Oppose and use science and common sense. If small areas have filtration ponds etc. and by testing the water and it is not being degraded, why fence whole areas? The council should take into account the financial implications of this decision.
468.2	Lawrence Farms Ltd (Charles Lawrence)	Rule 70	Oppose	No waterway fencing required where low density deer grazing is in practice.
474.6	LITTLE Robert Edsall	Rule 70	Oppose	<p>Delete all farming restrictions based on Physiological zones</p> <p>Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining &amp; improving water quality</p> <p>Due diligence should be from economic, social &amp; cultural view points</p>
476.4	Lochhead Holdings Ltd	Rule 70		Remove requirement for land use consent.
482.21	Lower Aparima Catchment Group	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
483.20	Ludell Ltd	Rule 70	Oppose	Sheep and Deer should be included in these exclusions.
484.4	M A Beer & Sons	Rule 70	Oppose	Absolutely oppose the idea of fencing off all waterways on our peat wetlands property to graze a few cattle. Remove this requirement in the Peat Wetlands for cattle grazing.
485.3	M B Dillon	Rule 70 (a) (ii)	Oppose	Allow grazing banks during driest spells by sheep stock.
488.4	MACDONALD Brian	Rule 70	Oppose	Time frame too short. Should be 5% a year.
492.6	MACKAY Alexander	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and

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				cultural viewpoints.
493.6	MACKENZIE Toni	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
494.4	MACKINTOSH Alistair	Rule 70	Amend	Amend Rule 70 to exclude fencing off for stock on bigger extensive, flatter properties.
496.5	MACPHERSON Chanelle	Rule 70	Oppose	While I support this I believe the cost and time involved to properly fence our waterways is unachievable in the timeframe.
500.2	Mararoa Downs	Rule 70	Oppose	This rule is not practical on a large extensive farm there are too many creeks to fence it would cost over hundred thousand to fence and there would be too much ongoing maintenance. It would ruin the flow of the farm and a water scheme would have to be installed. It could be an option to temporarily fence when intensively grazing.
502.12	MARSHALL Allan & Kathryn	Rule 70	Oppose	Fencing Deer and Cattle from 95% of waterways below 4 degree slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at the catchment limit setting process. Once a farm had a stock water scheme in place 100% of waterways below 4 degrees should be fenced and higher risk waterways above that could become the focus in collaboration with the Land Sustainability Team.
503.6	MARSHALL Logan	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
505.6	MARSHALL Norman	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
506.7	MARSHALL R C	Rule 70		Delete rule relating to cattle on land sloping less than 16 degrees. Retain the rule that does not exclude cattle on land sloping greater than 16 degrees. Delete rule relating to sheep not being part of the exclusion. Amend (a) (vi) & (vii) to 2025. Amend (a) (vii) & (vii) to encourage exclusion where practical along with farm management plans. Remove the reference to a 20 metre width.
507.12	MARSHALL Spencer	Rule 70	Oppose	Fencing Deer and Cattle from 95% of waterways below 4°slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at the catchment limit setting process. Once a farm had a stock water scheme in place 100% of

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				waterways below 4° should be fenced and higher risk waterways above that could become the focus in collaboration with the Land Sustainability Team.
508.3	Martyn Farming Ltd	Rule 70	Amend	Should be looked at in more detail including which physiographic zone it falls into, the impact of stock in waterway at particular site and the size of the waterbody – i.e. depth and width, volume. One rule certainly does not fit all here.
511.4	MCCALL Ashley John	Rule 70	Amend	Amend so that fenced waterways for cattle is recommended but not compulsory. High country should be excluded as it is an animal welfare issue.
517.6	MCDONALD Colin & Dot	Rule 70	Oppose	Take a closer look at the fencing costs! Also if you are going to remove the water from our farms by fencing off the waterways, then you have to include the cost of putting in a water scheme. And also compensate for the loss of area which we grazed. Fenced waterways still need to be maintained to prevent waterlogging or in some cases erosion.
518.12	MCDONALD Stuart & HALDER Robyn	Rule 70		Allow this to occur over time as part of good farming practice, in conjunction with installation of stock water schemes, as economics allow.  Extend leniency for sheep grazing to cattle and deer grazing in the Southland hill and high country.
521.6	MCEWAN Trevor & Anthea	Rule 70	Support in part	We support that <ul style="list-style-type: none"> <li>• sheep are not part of this rule and are instead managed through a farm plan.</li> <li>• Exclusion does not apply to cattle on hill country greater than 16 degrees, however as an alternative we propose Our FEP will identify our waterways. ES staff confirm our plans and timeframes are appropriate. We can implement our FEP without further resource consents. This would still be a significant cost but is more reasonable than what is proposed in the Plan. We can choose time frames that are achievable financially.</li> </ul>
524.4	MCINTYRE Craig & Rebecca	Rule 70	Support in part	I do agree with sheep being excluded from this rule and fencing off main creeks.  I propose a fencing policy which allows for discretion, applicable to individual properties.
527.6	MCKAIN Belinda	Rule 70	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
536.14	McKelvie Ltd	Rule 70	Amend	Amend to provide less of a blanket approach to fencing waterways and clarify what a

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				“waterbody” is.
538.7	MCKENZIE Hayden	Rule 70	Support	Retain.
539.6	MCKENZIE Matthew	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
547.13	MCMULLEN G F	Rule 70	Oppose	Agree with fencing them off from major creeks but every waterbody is too much.
548.6	MCMULLEN Leith	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
550.2	MCNAMEE T W & J N	Rule 70	Oppose	Run off blocks allowed to continue for normal use of sheep and cattle, if not intensified stocking.
551.3	MCPHAIL Glen	Rule 70	Support	Retain.
552.4	MCPHAIL Neil	Rule 70		I would like to see that rule 70 does not apply to stocking rates that are under five stock units/hectare.
553.11	McPhelzo Trust (C G & M P Pullar)	Rule 70	Support in part	Retain sheep not being part of this rule and instead being managed through a farm plan. Retain exclusion not applying to cattle on hill country greater than 16 degrees. Replace with a provision where the farmer will identify where they will fence waterways in the Farm Environment Plan. Environment Southland sustainability staff confirm that the areas identified/timeframes are appropriate. Farmer implements the riparian plan without the need for a resource consent. Extend the timeframe for cattle to be excluded.
554.12	McPhelzo Trust (Z, E & P Pullar)	Rule 70	Support in part	Retain sheep not being part of this rule and instead being managed through a farm plan. Retain exclusion not applying to cattle on hill country greater than 16 degrees. Replace with a provision where the farmer will identify where they will fence waterways in the Farm Environment Plan. Environment Southland sustainability staff confirm that the areas identified/timeframes are appropriate. Farmer implements the riparian plan without the need for a resource consent. Extend the timeframe for cattle to be excluded.
555.15	MCRAE Daryl & Ruth	Rule 70	Support in part	We like that sheep are excluded. We like that we do not have to exclude stock where the slope



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				in greater than 16 degrees. We support those parts of the plan. We don't like that: There are some areas of our property where fencing off small waterways will result in cutting off small areas of land and be impractical. We propose 1 May 2021 for cattle would be a more reasonable timeframe.
556.12	MCRAE Joe	Rule 70	Oppose	Target high risk streams, rivers etc. Set a limit of anything over 3m wide and 30cm deep year round has to be fenced off to exclude cattle and deer by 2020.
557.11	MCRAE Matt	Rule 70	Oppose	Target high risk streams, rivers etc. Set a limit of anything over 3m wide and 30cm deep year round has to be fenced off to exclude cattle and deer by 2020.
558.13	MCRAE Natalie	Rule 70	Oppose	The Council needs to undertake further research into stock exclusion and fencing of waterways before confirming. Require anything over three metres wide and 30 cm deep year round to be fenced off (if not a flood hazard) to exclude cattle and deer by 2020.
559.4	MCRAE Neroli	Rule 70	Oppose	Consultation and review is needed to ensure this is manageable and effective. Research needed as to the long term effects of fencing off areas.
561.4	MENLOVE William	Rule 70	Oppose	Remove the requirement for stock exclusion from waterbodies on hill country.
563.6	MEYER Timothy	Rule 70	Oppose	Delete all farming restrictions based on Physiological zones Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining & improving water quality Due diligence should be from economic, social & cultural view points
564.17	Mid-Aparima Catchment Group	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
567.2	MILLER Geoffrey	Rule 70		No requirement for exclusion of sheep from waterways. Limited stock rate for cattle etc. should be allowance for designed fenced drinking areas.
568.4	MILLER N & L J Family Trust	Rule 70	Support	Retain provisions for sheep.
570.19	MILLER R L & S J Farm Trust	Rule 70	Support in part	Modify (vi) and (vii) to read that the waterbodies must be permanently flowing.
571.6	MILLER Susan	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.

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573.2	MINTY J R	Rule 70	Neutral	Sheep grazing to remain.
577.3	MOODY Luke	Rule 70	Oppose	Provide evidence of how stock exclusion in summer benefits water quality and fund the fencing and stock water system.
578.6	Moonlight Trust	Rule 70		I would like to be allowed to have cattle access to waterways in the hill country if you have less than 30% cattle to sheep ratio, as well as having a visit from a Land Sustainability Officer to discuss a waterway management plan.
579.2	MOORE James	Rule 70	Oppose	As an alternative I propose cattle numbers restricted around waterways so there is no impact.
583.27	MOSEBY Ryan	Rule 70	Amend	Adopt GMP approach through Appendix N, allow more time for farmers to complete what is significant capital work.
586.11	MOUAT Family Trust	Rule 70	Amend	Amend to take into account stock fiords on watercourses where over 20 metres, a slope of less than 16 degrees.
587.3	MOUAT James	Rule 70		Buffer zone need to be smaller and or degree of slope higher.
588.2	MOUAT Laurence	Rule 70(a)(vi) and (vii)	Amend	Dependent on the definition of the 'waterbody', time frames for exclusion of stock may be too short and too extensive. In conjunction with a completed farm plan landowners may apply for a 'restricted discretionary' consent to complete exclusion fencing. Based on stocking rate (especially cattle) consideration should be given 'modifying' compliance in extensive circumstances.
590.16	Mt Linton Station	Rule 70	Amend	Amend to 1 May 2025. Should not be compulsory for all stock to be excluded from water bodies in the high country physiographic zone when the slope is less than 16 degrees. A riparian management plan should not be compulsory.
592.6	Mt Peel Ltd	Rule 70	Amend	We propose to work with the environment southland land sustainability team to create a plan that works within this farm and keep working on the most at risk waterways where practical.
595.6	MURRAY Rex	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practices is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
600.2	NICHOLSON Peter	Rule 70	Oppose	Solution would be to put in temporary fencing along creek edges or a timeframe e.g. 5-10 years to put in main fencing and troughs. Too expensive to do over a short period.
603.15	Nithdale Station	Rule 70		As long as the water quality coming out of these paddocks/blocks is acceptable then there is no requirement to exclude livestock. Alternatively, where hill blocks/paddocks that have

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				waterbodies in them with slopes both over 16 degrees and under 16 degrees then there is no requirement to exclude cattle from them by May 2018. Mitigating factors could be included in the Farm Management Plan.
604.12	Nokomai Station Ltd	Rule 70	Oppose in part	We request that the rule is reworded to include cattle as permitted access to waterways, where no other stock drinking water supply is available, on extensive hill country stations.
607.2	North Range Partnership	Rule 70	Amend	We always strive to observe “Best Management Practice”. Not always practical to fence creeks/streams where a risk of flooding would have a far worse outcome.
609.6	NZ Deer Farmers Association – Southland Branch (Richard Cook)	Rule 70		<p>Amend Rule 70(a)(i) – Stock exclusion from waterbodies to read: (i) there is no discharge that gives rise to any conspicuous change in the colour or visual clarity in the receiving water <u>when measured beyond the zone of reasonable mixing and over a 24 hour period.</u></p> <p>Amend Rule 70(a)(v) – Stock exclusion from waterbodies to read: (v) where a dedicated stock crossing point or ford is used, conditions (i) and (ii) above may be disregarded, provided the crossing point is not more than 20 metres wide and aligns with a constructed track or raceway on either side of the crossing point;</p> <p>Amend Rule 70(a)(vii) – Stock exclusion from waterbodies to read:  (vii) despite (i) to (v), deer are to be excluded <del>from 1 May 2020</del> <u>within ten years of the plan becoming operational</u> from: rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees.  (viii) despite (vi and vii), where exclusion is not possible or practical, alternative mitigation measures to reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats are provided in a Riparian Management Plan in accordance with Appendix N;</p> <p>NZDFA-Southland requests that Environment Southland provide assistance to farmers to facilitate stock exclusion.</p> <p>Delete Rule 70(b).</p>

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610.2	NZ Deer Farmers Association – Southland Branch (Graham Murdoch)	Rule 70	Oppose	Delete and provide realistic and practical ruling for profitable farming.
613.6	NZ Groundspread Fertilisers Association Inc.	Rule 70	Amend	Amend timeframes to align with capital expense.
616.9	O'CONNELL Elizabeth	Rule 70	Support	Support that sheep and deer be excluded from the rule. Support that it is unnecessary to exclude cattle from waterways with a slope greater than 16 degrees. That above 300m above sea level this rule is exempt because of the high network of waterways, lower stocking rates, and lower producing country resulting in a reduced impact on water quality and reduced means to pay for the exclusion.
617.4	O'NEIL Craig & Colleen	Rule 70	Oppose	Hill country farming should be excluded from the stock access to waterways policy.
621.5	Otara Dairies Ltd	Rule 70	Support	Support the intent but practicality for dry stock farmers in terms of cost (including costs of stock water systems) and timeframes needs further work.
622.29	P F Olsen Ltd	Rule 70	Support Amend	Amend footnote 9 to Rule 70 to note that: distance is to be <u>measured horizontally</u> not as slope distance and be measured <u>back from the top of the bank of the bed of the river or stream.</u>
623.6	P H Bennett Ltd	Rule 70	Support Oppose	Support that sheep are not part of this rule and are instead managed through a farm plan. Oppose that deer must be excluded from 2020. This time frame is too short.
630.6	PATTULLO Pauline	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
633.2	PERKINS Aron Glyn	Rule 70	Oppose	Resource consents should be free initially for the first five years.
637.3	PINCKNEY Edward, MACGILLIVRAY Craig & STIRLING Paul	Rule 70	Oppose	Delete restrictions and require grazing plans that include grazing that won't affect water quality e.g. seasonal stocking rates.
640.50	Pourakino Catchment Group	Rule 70	Oppose	Apply 16 degree slope requirement to all P.Zones.
641.5	POYNTZ-ROBERTS David	Rule 70	Oppose	Oppose – who is going to pay us for the HA's of land lost?

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642.7	PREBBLE Lynden	Rule 70	Support	Retain.
643.7	PREBBLE Sandra	Rule 70	Support	Retain.
645.7	PRICE William	Rule 70		Remove rule relating to cattle on land sloping less than 16 degrees. Retain the rule that does not exclude cattle on land sloping greater than 16 degrees. Retain rule relating to sheep not being part of the exclusion.  Amend (a)(vi) and (a)(vii) to 2025. Amend (a)(vi) & (vii) to encourage exclusion where practical along with Farm management plans. Remove the reference to a 20 metre width.
646.11	Progress Valley Farms Ltd	Rule 70	Oppose	Fencing Deer and Cattle from 95% of waterways below 4° slope would be a workable alternative that would be a very good way of holding the line and could be further addressed at the catchment limit setting process. Once a farm had a stock water scheme in place 100% of waterways below 4° should be fenced a higher risk waterways above that could become the focus in collaboration with the Land Sustainability Team.
650.5	PULLAR I J & K M	Rule 70	Amend	Sheep can be grazed around water ways during dry weather.
651.3	PULLAR Logan Trust	Rule 70	Amend	Need to be able to graze waterways in summer months to manage grass and weeds.
652.8	PULLAR Mary	Rule 70	Oppose	Identify where I will fence off waterways in my Farm Environment Plan (We will be preparing a Farm Environment Plan anyway because of other parts of our farming operation). Environment Southland sustainability staff confirm that the areas we have identified/timeframes are appropriate. We implement my riparian plan without the need for a resource consent.
655.11	RABBIDGE Dean	Rule 70	Amend	Extend timeframes.
656.8	RABBIDGE Stephen	Rule 70	Amend	Amend the time frames for compliance for sheep and beef.
659.5	Rathfriland Ltd	Rule 70	Oppose Amend	Stock could be excluded from waterways on a stocking density basis. Cattle over the age of one year could be excluded (not R1 calves). Do not include stock water dams and duckponds in the exclusion rule.
665.2	Ribbonwood Farm	Rule 70	Amend	Environment Southland needs to assess recommendations on a case by case basis.
666.26	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 70	Support	Support as long as long as sheep remain excluded but delete Rule 70 (a)(vii).
674.2	ROBINS Sam	Rule 70	Oppose	Exclude the need to fence off ephemeral waterbodies.
676.6	ROBINSON Brent	Rule 70	Support in Part	Change from: all cattle to be fenced from waterways to: if less than 20% of your total stock

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				numbers are cattle (e.g. 20% cattle, 80% sheep) and rotational graze no more than 4 cattle per hectare, then fencing of waterways is not required.
677.4	Robinson Dairies Ltd	Rule 70		Replace with a more appropriate system that is less expensive.
678.8	ROBINSON Jeffrey	Rule 70	Oppose	Amend rule 70(a)(i) to allow for temporary changes in the colour or visual clarity in the receiving water. Amend the rule to allow for cattle assessing waterways where they are farmed on the same landholding and in conjunction with sheep. Amend Rule 70(a)(vi) to allow for more time for fencing to be undertaken. A date closer to when Council are expecting this process to be over (2023) should be used.
679.8	ROBINSON Michael	Rule 70	Oppose	Amend Rule 70(a)(i) to allow for temporary changes in the colour of visual clarity in the receiving water. Amend the rule to allow for cattle assessing waterways where they are farmed on the same landholding and in conjunction with sheep. Amend Rule 70(a)(vi) to allow for more time for fencing to be undertaken. A date closer to when Council are expecting this process to be over (2023) should be used.
681.22	Rockytommy Farming Ltd	Rule 70	Support Amend	Amend the Rule to not require fencing of waterways on the steeper reaches of Southland where extensive sheep and beef operations occur on uncultivated hill country.
682.17	Rokenwai Farming Ltd	Rule 70	Support Amend	Amend the Rule to not require fencing of waterways on the steeper reaches of Southland where extensive sheep and beef operations occur on uncultivated hill country. Also the exclusion of sheep from, in our case, the Waikaia River is virtually impossible unless Environment Southland want to fund the re-fencing each time the river floods.
684.5	ROSE David	Rule 70	Support	Keep sheep not excluded from waterbodies. Review hill and high country exclusion against practical considerations. Do not let urban perceptions override factual information.
689.7	ROSS Keith	Rule 70	Oppose in part	Oppose rule relating to cattle on land sloping less than 16 degrees.  Support the rule that does not exclude cattle on land sloping greater than 16 degrees. Support rule relating to sheep not being part of the exclusion.  Amend implementation date of 2018 in (a)(vi) and (vii) to 2025.  Amend (a)(vi) and (vii) to encourage exclusion where practical along with Farm Management Plans. Remove the reference to a 20 metre width.

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				Oppose rule relating to cattle on land sloping less than 16 degrees.
690.7	ROSS Warren	Rule 70	Oppose	A more pragmatic approach as opposed to regimented approach. E.g. if all waterways are fenced off this will encourage silt and weed problems which will in turn create additional issues.
691.7	Rossland Farming Ltd	Rule 70	Oppose	A more pragmatic approach as opposed to regimented approach. E.g. if all waterways are fenced off this will encourage silt and weed problems which will in turn create additional issues.
692.10	ROWE Emma	Rule 70	Neutral	<p>I agree that cattle shouldn't be in waterways in large amounts, however this could be adjusted for stocking rate as hill country farms running cattle on the back blocks at low stocking rates use waterways for stock water. At low stocking rates there is an argument for how much damage these actually do in comparison to the cost it would be to not only fence off all these waterways and put in water schemes, and the difference this would make to the environment.</p> <p>There needs to be some kind of support for farmers around time frames for getting areas fenced off as it is a big cost to their business especially at the moment when incomes are reduced.</p>
693.8	ROY Bevan	Rule 70	Oppose	Delete all farming restrictions based on Physiographic Zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
694.6	ROY Bruce	Rule 70	Support Amend	<p>As an alternative I propose:</p> <ul style="list-style-type: none"> <li>Identify where I will fence of waterways in my Farm Environment Plan (I will be preparing a Farm Environment Plan anyway because of other parts of my farming operation.)</li> <li>Environment Southland sustainability staff confirm that the areas I have identified/ timeframes are appropriate.</li> </ul> <p>I implement my riparian plan without the need for a resource consent.</p>
695.6	ROY James	Rule 70	Support in part Aamend	<p>Support that:</p> <ul style="list-style-type: none"> <li>Sheep are not part of this rule and are instead managed through a farm plan.</li> <li>Exclusion does not apply to cattle on hill country greater than 16 degrees.</li> </ul> <p>Amend:</p> <ul style="list-style-type: none"> <li>So farmers identify where to fence waterways in the Farm Environment Plan.</li> </ul>

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				<ul style="list-style-type: none"> <li>Environment Southland sustainability staff confirm that the areas I have identified/timeframes are appropriate.</li> <li>I implement my riparian plan without the need for a resource consent.</li> </ul>
696.4	RUDDENKLAU I & J	Rule 70	Support	Retain sheep being exempt.
699.6	Rural Livestock Ltd	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
700.6	Rural Solutions Ltd	Rule 70		<p>Suggest a twenty year time frame should be applied for fencing off waterways with a plan put in place for this period which prioritises the risk factors.</p> <p>A clear indication of time frames for sheep exclusion, if this is envisioned, must be given now. I also suggest that financial support, perhaps along the lines of a rates rebate to support and encourage fencing.</p> <p>Is there scope to consider the enhancement of wetlands to act as filters for waterways that are just not practical or too costly to fence off?</p>
706.13	Sandy Creek Trust	Rule 70	Amend	Extend the timeframe for deer fencing of waterways.
708.6	Scandrett Rural Ltd	Rule 70	Amend	It is suggested where necessary, due to physical constraints or financial necessity, that a longer time period be available for this work. Any such work should be prioritised based on fencing off areas where there is a higher risk to water quality first.
709.3	SCHMIDT D	Rule 70	Oppose	That the watercourse is 3m wide or more.
710.9	Schrader Mains Ltd	Rule 70		Amend the wording in Rule 70(a)(vi) to state “excluding <del>sheep and</del> deer.”
711.16	SCOTT G D & M M	Rule 70	Oppose Amend	No specific decision requested.
712.35	Seaview Trust & Oraka Farms Ltd	Rule 70	Support	Support stock exclusion rules in lowland areas and exclusion of sheep from the rule. Support stock exclusion on slopes above 16 degrees.
713.1	Selbie Farm Partnership	Rule 70		Our submission is that there should be no exclusion of sheep from any hill country waterway, at any time of the year, provided that normal good grazing practices are adhered to. i.e. mod to low stocking on extensive hill blocks and regular shifting of sheet under a rotation system.
714.6	SELLWOOD Luke	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both



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				maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
715.5	SHALLARD David & Kim	Rule 70	Support	Good to see that sheep do not have to be fenced off because they graze the banks and keep it weed free and so not damage the banks.
716.6	SHALLARD Mark & Tania	Rule 70	Support	Retain re: sheep not excluded.
718.12	Shallow Croft Ltd	Rule 70	Support	Retain re: sheep not excluded.
719.5	Sharp Trust	Rule 70	Support	Retain.
728.6	Slope Point Farms Ltd	Rule 70	Oppose	Delete and address stock exclusion in the farm plans.
732.6	SMITH George & Kathryn	Rule 70		Should our General relief not be accepted, we submit that Rule 70 should be retained.
733.17	SMITH Hamish & Karen	Rule 70		Amend Rule 70 to allow a small number of cattle to graze integrated with the sheep (e.g. set a low stocking rate limit for cattle here).
734.3	SMITH Warren	Rule 70	Oppose	Environment Southland pay for fencing.
737.30	Smithill Ltd	Rule 70	Amend	(a), (vi) - This should include "ALL STOCK are to be excluded from 1 May 2018 from: all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock/Hill Country physiographic zone, from all rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody, has a slope of less than 16 degrees."
738.5	Snowdon Downs	Rule 70	Support Oppose	Oppose planned setbacks; a 3 metre rule is sufficient.
739.4	SOMERVILLE John	Rule 70	Oppose Amend	Too rigid in its application and should be realistic in its intent as defined by the following amendment. "Progressive exclusion where possible and practical of all stock, except sheep, from all waterbodies, including artificial watercourses, on land with a slope of less than 16 degrees by 2027 (10 year time frame ) and the management of sheep in critical source areas. Where exclusion is not possible or practical, alternative mitigation measures to reduce sedimentation and microbial contamination of waterbodies and improve river and riparian ecosystems and habitats are provided in a farm management plan."  The term waterbodies is defined as "rivers, natural wetlands, artificial watercourses, modified watercourses and lakes". According to the definitions in the glossary this means that any flow

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				<p>of water even ephemeral falls under this rule. There needs to be better clarification in size and flow as the rule is wide open to interpretation.</p> <p>This fencing rule can be covered by using the farm management plan, as it will clearly document the progress and plans in conjunction with help from land sustainability. The use of a consents process is unnecessary and we feel the detail and costs of this are unknown by the council as they may have to apply a consenting process on a large number of deer and beef farmers.</p>
740.7	South Coast Dairy Ltd	Rule 70	Support Amend	<p>Amend to continue to work towards stock exclusion but work within what is practical.</p> <p>Consider longer timeframes to meet exclusion deadlines.</p>
744.4	Southern Farms NZ Ltd (Gene Bryce)	Rule 70	Amend	<p>Extensive grazing at less than 4 Su/Ha should be excluded from this rule.</p> <p>Should be part of farm management plans to include with all other systems.</p> <p>&lt;16 degree rule as a guide for management plan to identify priority exclusion.</p>
745.2	Southern Farms NZ Ltd (Brendon Duthie)	Rule 70	Oppose in part	<p>Delete setbacks.</p> <p>Provide areas where stock can access water with little disruption to water and banks.</p>
748.10	Southern View Ltd	Rule 70	Support	Retain.
752.163	Southland Fish & Game Council	Rule 70	Support Amend	<p>Amend to:</p> <p>“Stock exclusion from waterbodies <u>and riparian margins</u></p> <p>(a) The disturbance of the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse by stock and associated discharge through access by stock is a permitted activity provided the following conditions are met:</p> <p>(i) There is no discharge that gives rise to any conspicuous change in the colour or visual clarity <u>or sedimentation</u> in the receiving water;</p> <p>...</p> <p>(v) Where a dedicated stock crossing point or ford is used, condition (ii) above may be disregarded, provided the crossing point is not more than 20 metres wide and aligns with a</p>

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				<p>constructed track or raceway on either side of the crossing point <u>and</u>:</p> <p>(4) <u>There is no existing structure available for use; and</u></p> <p>(5) <u>There is no discharge that gives rise to any conspicuous change in the colour or visual clarity or sedimentation in the receiving water;</u></p> <p>(6) <u>There is no slumping, pugging or erosion of the banks; and</u></p> <p>(7) <u>The discharge does not reduce the water quality below any standards set for the Relevant waterbody in Appendix E “Water Quality Standards” at the downstream edge of the reasonable mixing zone.</u></p> <p>“(vi) <u>There is no feeding out or supplementary feeding of stock in, over or on the bed of a lake, river, natural wetland, artificial watercourse or modified watercourse and their margins.</u>”</p> <p>Amend Rule 70(a)(vii) as follows:</p> <p>(viz) despite (i) to (v), stock (excluding sheep and deer) are to be excluded from 1 May 2018 from: all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre,</u> rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre,</u> rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees.</p> <p>(vii) despite (i) to (v), deer are to be excluded from 1 May 2020 from: all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre,</u> rivers, natural wetlands, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone,</p>

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				<p>from all <u>headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre</u>, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees.</p> <p><u>(viii) despite (i) to (v) sheep are to be excluded from 1 May 2022 from: all natural wetlands in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all natural wetlands where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees.</u></p> <p><u>(ix) despite (i) to (v) sheep are to be excluded from 1 May 2024 from: all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, artificial watercourses, modified watercourses and lakes in the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Old Mataura, Central Plains, and Riverine physiographic zones; and in the Bedrock / Hill Country physiographic zone, from all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, artificial watercourses, modified watercourses and lakes where the land, when measured over a width of 20 metres from the waterbody has a slope less than 16 degrees in the following catchments:</u></p> <ul style="list-style-type: none"> <li>(4) <u>Otautau Stream;</u></li> <li>(5) <u>Waikouro Stream; and</u></li> <li>(6) <u>Winton Stream.</u></li> </ul> <p><u>(x) In relation to stock exclusion requirements set out in (vi) to (ix) a vegetated strip are to be maintained, and stock excluded from, the outer edge of the bed of all headwater seeps / springs, tarns, intermittent / ephemeral streams with an active bed wider than 1 metre, rivers, natural wetlands, artificial watercourses, modified watercourses and lakes for a distance of:</u></p> <ul style="list-style-type: none"> <li>(3) <u>5 metres measured horizontally from the outer edge of the bed on land within a slope of less than 4 degrees (flat); and</u></li> </ul>

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				(4) <u>10 metres measured horizontally from the outer edge of the bed on land within a slope between 4 and 16 degrees (rolling).</u> Amend Rule 70 to provide that stock crossing points for stock listed in Rule 70(a)(vi) and (vii) must be bridged or culverted.
759.25	Springlands Group Ltd	Rule 70	Support Amend	Amend the Rule to not require fencing of waterways on the steeper reaches of Southland where extensive sheep and beef operations occur on uncultivated hill country.
761.17	STALKER Hanna & Callum	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
762.9	STANLEY Karen	Rule 70	Support	Where it is not practical to fence off waterbodies, identify critical source areas and manage in farm environmental plan.
767.9	STEVENS David	Rule 70		Farmers should be given to 2025 to achieve deer fencing without a consent process and the huge costs involved. This process should take into account what a farmer may have achieved in protecting waterways on their farm in previous years. A Farm Management Plan should control this process. Farmers should be able to apply a practical fencing programme that best protects the major water systems on the farm, through double fencing where practical and using sediment traps/filter zones on the lower reaches of awkward water systems. Why has this option been left out of the Water and Land Plan – clarification required. Revert to previous rules requiring protection for waterways from all stock under intensive winter grazing.
767.10	STEVENS David	Rule 70		This rule can be covered by using the farm management plan.
769.4	STEVENSON G V & B P	Rule 70(vi)	Amend	Fence off 3 metres from waterway.
770.3	STEWART Family Trust (David Stewart)	Rule 70	Oppose	Exclude beef cattle from waterways over the intensive winter grazing period. Outside this period allow beef cattle access to waterways for stock water at a set limit of .075 head per ha for the total farm size. Eg: 600 ha x 0.75 head = 450 total head of beef cattle.
771.14	STEWART Family Trust (Virginia Stewart & Trevor Stewart)	Rule 70	Oppose	Leave the creeks unfenced as they are.
771a.11	Grahame Stewart	Rule 70	Oppose	As an alternative I propose that Environment Southland has a different plan for beef cattle as the mob sizes are not the same as intensive dairying (i.e. maximum of 50 beef cattle in a mob).

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	(Filwood Farm)			
773.9	STEWART Rory	Rule 70	Oppose	Fencing materials and sundries needs to be supplied at no cost to the landowner. Compensation needs to be paid for the land where stock are excluded from.
775.7	Stoney Creek Station Ltd	Rule 70	Oppose Support	Oppose rule relating to cattle on land sloping less than 16 degrees. Support the rule that does not exclude cattle on land sloping greater than 16 degrees. Support rule relating to sheep not being part of the exclusion. Amend (a) (vi) to 2025 to align to NPS-FM. Amend (a) (vi) & (vii) to encourage exclusion where practical along with Farm management plans. Remove the reference to a 20 metre width.
777.12	STRATFORD Chris & Lynsey	Rule 70	Neutral	Work with industry bodies to determine a practical time frame and appropriate support for these farmers. Listen to the farmers who submit against this plan about what is achievable and what the impact of these rules changes will be for their business.
779.6	Strathallan Trust	Rule 70	Amend	Sheep free access to graze banks of rivers in period September to May <u>excluded</u> from banks intensive grazing over winter i.e. May to September.
781.2	STRINGER Dougal	Rule 70	Oppose	Environment Southland should include provision to control weeds in the fenced off areas.
782.5	STRINGER Gay	Rule 70	Oppose	As this seems to relate to cattle only can I suggest that it be stock rate/ha driven, so that those farmers running beef cattle aren't penalised as they will be operating a much lower stock rate. With respect to fencing water ways, the weed control of the fenced off area to become the responsibility of Environment Southland. An allowance for stock to access creeks for drinking water where there is no water scheme.
783.6	STRINGER Joe	Rule 70(a)	Support	What account has been taken for feral animals (deer) and their need to access water?
786.8	SUTHERLAND Kevin & Ann	Rule 70	Support Amend	Amend to allow farmers to identify where they will fence off waterways in their Farm Environment Plan. Environment Southland sustainability staff will then confirm that the areas I have identified/timeframes are appropriate and I implement my riparian plan without the need for a resource consent.
787.6	SUTHERLAND Richard	Rule 70	Support	Retain.
790.12	TAIT G R & J E & Waikawa Valley Trust	Rule 70	Oppose	There is no allowance for the number of cattle – a limited number of cattle at one time could be allowed in these areas (large difference between the impact of 2 compared to say 200 cattle) and/or extend the exclusion date to 2025 to align with consent conditions (we note that if the condition of excluding cattle by 2018 is not achieved a consent can be applied for which gives – provided a Riparian Plan is presented – a completion date of 1 Jan 2025!!!). This appears to be a revenue driven objective, not an environmental one and could impact on the “re-sale” value of our farm.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
791.6	TALBOT Jeanette	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
792.34	TAYLER Matthew	Rule 70	Oppose	Remove reference to hill country zone and 16 degree slope. Alternatively, the timeframe for the hill country zone should be extended out to 2022. A threshold should be introduced for cattle stocking rate relative to fencing to reflect fact extensively grazed cattle have minimal impact – say above 10 cattle stock units/ha they need to be excluded, below they can have access.
795.4	TAYLOR George	Rule 70	Amend	Some flexibility is required. Discolouration of waterways in times of high rainfall should not potentially be an offence.
796.6	TAYLOR Marcy	Rule 70	Oppose	Delete all farming restrictions based on physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
797.50	Nga Runanga and TRONT	Rule 70(a)(vi), (b) & (c)	Support in part	Retain rule as proposed but add new clause (vii) as follows: <u>despite (i) to (v), sheep are to be excluded from 1 May 2018 from all natural state waters, natural wetlands, nohoanga sites, mātaītai, taiapure, and estuaries and by 1 May 2020 from all water bodies within the Peat Wetlands, Lignite-Marine Terraces, Gleyed, Oxidising, Central Plains, Old Maitaura and Riverine Physiographic Zones .</u> And Retain clause (b) and (c) as proposed.
799.12	TEMPLETON Peter	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
802.31	The 254 Partnership & Gerken Family Trust	Rule 70	Amend	Support exclusion of sheep, Oppose extensive hill and high country farmers being required to exclude stock.
807.7	The Terraces Ltd	Rule 70	.	Oppose rule relating to cattle on land sloping less than 16 degrees. Support the rule that does not exclude cattle on land sloping greater than 16 degrees. Support rule relating to sheep not being part of the exclusion. Amend (a) (vi) to 2025 to align to NPS-FM. Amend (a) (vi) & (vii) to encourage exclusion where practical along with Farm management plans. Remove the reference to a 20 metre width.
810.49	Three Rivers Catchment Group (TRCG)	Rule 70	Oppose	Apply 16 degree slope requirement to all Physiographic Zones.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
812.6	TIDEY Allan	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
816.9	TIPPETT Christie	Rule 70	Oppose	Amend Rule 70(a)(i) to allow for temporary changes in the colour of visual clarity in the receiving water.  Amend the rule to allow for cattle accessing waterways where they are farmed on the same landholding and in conjunction with sheep.  Amend Rule 70(a)(vi) to allow for more time for fencing to be undertaken. A date closer to when Council are expecting this process to be over (2023) should be used.
817.25	Tomogalak Gorge Trust (Jeffery Keen)	Rule 70	Support Amend	What is the definition of a river that triggers total stock exclusion except sheep i.e. 200mm deep in normal flow and how wide?
821.6	TOSH David	Rule 70	Oppose	No specific decision requested.
824.7	Tulloch Farm Glendhu Ltd	Rule 70	Amend	Amend (a)(vi) to 2025 to align to NPS-FM and amend (a)(vi) and (vii) to encourage exclusion where practical along with Farm Management Plans. Remove the reference to a 20 metre width.
825.7	Tulloch McNab Transport Ltd	Rule 70	Oppose	Amend (a)(vi) and (vii) to 2025 to align with NPS-FM. Amend (a)(vi) and (vii) to encourage exclusion where practical along with Farm Management Plans. Remove reference to a 20 metre width.
827.8	TURNER Paul & Kayleen	Rule 70	Oppose	Where hill country is in its natural state i.e. still in tussock etc. and had no cultivation or major intensification, that land should be excluded from the stock exclusion rules. (Sheep and Beef only) Could add a stocking rate to that of say 5 per Hectare or less would be excluded.
831.6	VAN DER BIJL Willem	Rule 70	Oppose	Limit fencing requirement in hill country.
832.130	VAN GOOL Raewyn	Rule 70	Support	I support Rule 70 except (a)(vi) and (a)(vii) has not taken into true account the cost and impact this will have on some farmers. No allowance has been made for stocking rates where this is currently occurring. Where there is currently no degradation of water quality where stock access is currently allowed Farm Management Plans that show GMP and good management of CSA's should enable farms to be considered on a case-by-case basis. With MPI working towards a national regulation this Rule needs to have flexibility to recognise whatever MPI comes up with.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
835.6	VAN ZYL Hendrik	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
836.6	VAN ZYL Michelle	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
837.3	Venlaw Ltd	Rule 70	Amend	Stocking rate per hectare should be considered in ES decision. E.g. 1 cattle su/hectare.
840.9	W & B Clarke & Son Ltd	Rule 70		As noted under our general comments in relation to the Peat Wetlands Physiographic Zone and for the reasons noted there needs to be a mechanism for farm by farm assessment where the true cost of the proposed regulations to a farming operation within the zone are considered and individual plans with achievable timeframes developed in consultation with Environment Southland not a one shoe fits all regulatory approach with the potential to ruin livelihoods. Consideration should also be given in the Plan for the issue of constructing fences within flood plains.
841.1	WADWORTH Nicholas	Rule 70	Oppose	There needs to be more options for the exclusion of stock. An example would be that we don't have to fence off the waterways but can only run a certain amount of cattle/hectare in that paddock at one time. If the farmer already has or is in the process of developing a water scheme (troughs), then the cattle are not inclined to go to the creeks anyway and would rather drink from the trough in the paddock. So if there are troughs present then perhaps there is no need for fencing off all the small creeks on the farms. I do like that sheep are excluded from the rule.
846.4	WALSH Brian	Rule 70	Oppose	Time frame to short impossible to do in 18 mths.
847.3	WALSH Kerri	Rule 70	Oppose	Make permitted.
851.4	WEIR Darren	Rule 70	Support	Retain.
853.4	WEIR Victoria	Rule 70	Support	Retain.
854.5	WELLER Grant & Bernie	Rule 70	Support Oppose	Support sheep exclusion and amend to cattle stocking rate exemption threshold – 5 Su/ha and mitigate risks through the Farm Environment Plan.
860.5	WHITE John (Richard)	Rule 70 vi	Amend	Amend to on uncultivated tussock country where cattle numbers do not exceed 10 stock units per hectare, no fencing will be required, unless it's a major water course of over 4 metres in

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				width.
861.28	WHITE John Copeland	Rule 70	Oppose	A stock unit per hectare threshold for these rules should be included.
866.5	WILKINS Brendan	Rule 70	Oppose	Allow good management practice to prevail.
867.6	WILKINS Donna	Rule 70		Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
868.27	Wilkins Farming Ltd	Rule 70(vii)	Support in part	We support the exclusion of sheep from the rule. Access to waterways by deer and cattle in hill country greater than 10 degree gradient should be a permitted activity adopting good management practise. Purpose built wetlands at the outlet of the farm which act as a filter for the surface water body before it enters tributaries could be a tool to mitigate adverse water quality if it is proven that the stock are causing any adverse effects.
869.9	WILKINS Pam	Rule 70	Amend	Retain points (i) to (v). Point (vii) – access to waterways by deer should be a discretionary activity in a controlled and good practice environment.
873.6	WILLIAMSON James	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
878.4	WILSON Douglas	Rule 70	Support	Retain with sheep being not included.
880.70	WILSON Shannon	Rule 70 (a)(i)(ii)(iii)(v)	Support in part	Retain.
883.4	WING Darren & Jenny	Rule 70	Support Oppose	I support the exemption of sheep form the exclusion rates. I oppose the inclusion of cattle from all waterways. Exclusion of cattle/deer from waterways when intensively grazed over winter or over a certain stocking rate per hectare.
884.6	WINTER Amy	Rule 70	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
886.1	WOODROW A B & L M Family Trust	Rule 70	Amend	Amend Rule 70 to allow an alternative approach: - Farmer identifies fencing of waterways in Farm Environment Plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>- Environment Southland sustainability staff confirm that the areas identified/timeframes are appropriate.</li> <li>- Farmer implements riparian plan without the need for a resource consent.</li> </ul>
890.6	WRIGHT Lindsay Family Trust	Rule 22	Oppose	Delete all farming restrictions based on Physiographic zones. Delay regulation until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality. Due diligence should be from economic, social and cultural viewpoints.
892.5	YOUNG A R & R B Partnership (Andrew Young)	Rule 70	Amend	Farm environment plan to identify areas in need of stock exclusion and a realistic timeframe to carry out the fencing.
893.6	YOUNG A R & R B Partnership (Rosanne Young)	Rule 70	Support Amend	A farm environment plan would identify areas which could be improved with a realistic timeframe to carry out the improvements as finances allow. With a farm environment plan approved a resource consent for stock access to waterways would be unnecessary.
894.4	YOUNG Robert	Rule 70	Amend	Extension of timeframe to May 2020, provided that the plan is in Farm Environment Plan and started by May 2018.

### Rule 71 – Channel realignment, widening or deepening

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
10.3	Aggregate & Quarry Association of NZ	Rule 71	Support in part	Amend Rule 71 as follows: <u>Unless provided for as a gravel extraction activity under Rule 73, the excavation or disturbance of the bed of any river, modified watercourse, or lake for the purpose of realigning, widening or deepening any channel within the bed is a discretionary activity.</u>
89.37	BRENTLEIGH Family Trust	Rule 71	Support	Retain.
108.100	BYTHELL Jesse	Rule 71		I seek the addition of the following clause in Rule 71(a), ‘there shall be no damage or destruction of significant indigenous vegetation.’
205.33	Dillon Ag Ltd (Chris Dillon)	Rule 71	Support	Retain.
206.33	Dillon Ag Ltd	Rule 71	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Rochelle Dillon)			
279.103	Forest & Bird NZ	Rule 71	Support	Retain.
314.9	Gladvale Farms Ltd	Rule 71	Oppose	Amend to be a permitted activity.
449.36	KiwiRail Holdings Ltd (KiwiRail)	Rule 71	Amend	Amend as follows: Rule 71 – Channel realignment, widening or deepening <b>Except as provided for elsewhere in this Plan</b> <del>the</del> excavation or disturbance of the bed of any river, modified watercourse, or lake for the purpose of realigning, widening or deepening any channel within the bed is a discretionary activity.
523.14	MCGREGOR Grant	Rule 71	Support	Retain.
614.32	NZ Transport Agency	Rule 71	Support	Retain.
698.5	Rural Contractors of NZ (Graeme Mathieson)	Rule 71	Support in part	Amend Rule 71 as follows: <u>Unless provided for as a permitted activity under Rule 78,</u> <del>the</del> excavation or disturbance of the bed of any river, modified watercourse, or lake for the purpose of realigning, widening or deepening any channel within the bed is a discretionary activity.
752.164	Southland Fish & Game Council	Rule 71	Support	Retain.
753.14	Southland River Liaison Committees	Rule 71	Support	Retain.
792.35	TAYLER Matthew	Rule 71	Support in part	A condition added allowing limited bank battering and removal of gravel beaches on smaller creeks where erosion is occurring or the course of the creek is being altered and flood capacity compromised.
802.32	The 254 Partnership & Gerken Family Trust	Rule 71	Support	Retain.
832.131	VAN GOOL Raewyn	Rule 71	Support	Retain

### Rule 72 – Dry cuts

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.38	BRENTLEIGH Family	Rule 72	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Trust			
108.101	BYTHELL Jesse	Rule 72		I seek the addition of the following clause in Rule 72(a), 'there shall be no damage or destruction of significant indigenous vegetation.'
205.34	Dillon Ag Ltd (Chirs Dillon)	Rule 72	Support	Retain.
206.34	Dillon Ag Ltd (Rochelle Dillon)	Rule 72	Support	Retain.
279.104	Forest & Bird NZ	Rule 72	Support	Retain.
355.14	HARRIS David	Rule 72	Amend	Add a requirement that the natural character of the riverbed be maintained to the conditions for this activity.
372.27	Heritage NZ	Rule 72	Support in part Amend	Retain Rule 72(a)(vi) and associated matter of discretion 2.
523.15	MCGREGOR Grant	Rule 72	Support	Retain.
614.33	NZ Transport Agency	Rule 72	Support	Retain.
752.165	Southland Fish & Game Council	Rule 72	Support Amend	Amend to include: <u>(x) The activity does not impede any legal access to the river, modified watercourse, stream or lake.</u> Amend Rule 73(a) to provide: “... Environment Southland will restrict its discretion to the following matters: 1. The design and location of the work. 2. <u>The quantity of material extracted; and</u> 3. Any effects on <u>the rate of gravel replenishment, flood risk,</u> river, modified watercourse, stream, lake <u>or associated waterbody</u> morphology and dynamics (including erosion <del>and</del> <u>or</u> deposition), aquatic and riverine ecosystems and habitats ( <u>including fish passage</u> ), <u>taonga species,</u> historic heritage, <del>and</del> the spiritual and cultural values and beliefs of the tangata whenua, <u>landscape, natural character and amenity values, navigation hazard, and public access and recreation values;</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>4. <u>Any conditions in Rule 72(a) that cannot be met.</u></p> <p>–In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things:</p> <p><u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.15	Southland River Liaison Committees	Rule 72	Support	Retain.
802.33	The 254 Partnership & Gerken Family Trust	Rule 72	Support	Retain.
832.132	VAN GOOL Raewyn	Rule 72	Support	Retain.

### Rule 73 – Gravel extraction

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
10.4	Aggregate & Quarry Association of NZ	Rule 73	Support	Retain.
13.7	All In Ltd	Rule 73	Amend	Amend to include ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
40.13	BAKER David	Rule 73	Support	Retain.
80.21	BLAKELY Barney & Stephanie	Rule 73	Support	Retain.
88.7	BRAITHWAITE Nathan	Rule 73	Oppose	Increase the gravel extraction allowed to 500m <sup>3</sup> per year.
89.39	BRENTLEIGH Family Trust	Rule 73	Support	Retain.
91.7	Bridesdale Farming	Rule 73	Support	Retain.
93.8	Broadacres Ltd	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				metres of a bridge structure.
108.102	BYTHELL Jesse	Rule 73		<p>I seek the addition of the following clause in Rule 73 (a) and (b) ‘there shall be no damage or destruction of significant indigenous vegetation.</p> <p>I seek that when considering resource consent applications for gravel extraction that the council have regard for the following:</p> <ul style="list-style-type: none"> <li>• Braided riverbeds are a naturally rare ecosystem as listed in the New Zealand Biodiversity Priorities (Priority 3).</li> <li>• Discourage extraction of gravel from the wetted part of the river.</li> <li>• Encourage the establishment of suitable nesting habitat for braided river bird species such as black billed gulls (Nationally Critical), black fronted tern (Nationally Endangered), banded dotterel (Nationally Vulnerable), pied stilt (Declining), South Island pied oystercatcher (Declining).</li> </ul> <p>Encourage offsetting work such as riparian restoration and increased ease of public access (where safety is not an issue).</p>
154.5	Coastal Plains Ltd	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
200.8	DICKIE Alton Brent	Rule 73	Amend	Review rule to allow gravel extraction for flood & erosion mitigation, but not within 100 metres of a bridge structure.
204.8	DICKSON Grant	Rule 73	Amend	Review rule to allow gravel extraction for floor & erosion mitigation, but not within 100 metres of a bridge structure.
205.35	Dillon Ag Ltd (Chris Dillon)	Rule 73	Support	Retain.
206.35	Dillon Ag Ltd (Rochelle Dillon)	Rule 73	Support	Retain.
207.8	Dillon Grain Ltd	Rule 73	Support	Allow for increased extraction limits.
209.45	DIPROSE Dave	Rule 73	Support	Retain.
210.92	Director-General of Conservation	Rule 73	Support in part	Retain the rule with a new condition inserted into paragraphs (a) and (b): <u>(vi) The gravel shall not be taken from any bare gravel bars.</u>
249.31	Ernslaw One Ltd	Rule 73	Support	Amend the rule to make the allocation per unit area of land, for example 12m <sup>3</sup> per 100ha or

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			Oppose	120m <sup>3</sup> per 1000ha or what Council decides is equitable.
258.22	Eyre Creek Ltd	Rule 73	Support in part	Amend Rule 73 to allow the extraction of gravel for farming purposes, as a permitted activity. We suggest that gravel extraction should be taken on a case by case basis that captures the environmental benefit of managing aggrading gravel levels and river containment as well as economic benefits. Amend Rule 73 (a) (i) .....less than 500m <sup>3</sup> /year
265.103	Federated Farmers of NZ (Southland Province)	Rule 73	Support in part	Amend Rule 73 to provide for the extraction of gravel where gravel build-up is causing erosion and for uses ancillary to farming the land is a permitted activity, with the conditions as per gravel extraction as a restricted discretionary activity.
279.105	Forest & Bird NZ	Rule 73	Support with minor amendment	Retain with following addition: (vi) The gravel shall not be taken from bare gravel bars.
288.36	Fulton Hogan Ltd & Southern Aggregates Ltd	Rule 73	Support in part	Amend Rule 73 to provide further clarity: Rule 73 – Gravel extraction (a) The excavation or disturbance of the bed of any river, modified watercourse, stream or lake for the purpose of extracting gravel is a restricted discretionary activity provided the following conditions are met: (i) the quantity of gravel removed is less than 120 cubic metres per year; (ii) there shall be no extraction from flowing water <del>or from below the Q95 level of the river;</del> (iii) <del>no holes or pits shall be dug and</del> the area shall be left level and tidy on completion of the activity; [...]
299.21	GARDYNE John	Rule 73	Oppose	Change to permitted activity.
314.10	Gladvale Farms Ltd	Rule 73(a)(i)	Oppose Amend	Suggest ES river staff have power to say where gravel comes from.
372.28	Heritage NZ	Rule 73	Support in part Amend	Retain Rule 73(a)(x) and associated matter of discretion 2.  Retain Rule 73(b)(vii) and associated matter of discretion 3.
397.4	Hughes-Crowley Company Ltd	Rule 73	Amend	Include the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
430.1	K M S Farms Ltd	Rule 73	Amend	Include the ability to use gravel on site for purposes of maintaining lanes and tracks.
431.7	Kaikaha Farms Ltd	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
449.37	KiwiRail Holdings Ltd (KiwiRail)	Rule 73	Amend	Amend as follows: Rule 73 – Gravel extraction (a) The excavation or disturbance of the bed of any river, modified watercourse, stream or lake for the purpose of extracting gravel is a restricted discretionary activity provided the following conditions are met: ... <del>(x) there are no recorded historic heritage sites, at the site of the activity; ...</del>  (b) The excavation or disturbance of the bed of any river, modified watercourse, stream or lake for the purpose of extracting gravel or aggregate for flood or erosion control or the protection of infrastructure is a restricted discretionary activity provided the following conditions are met: ... <del>(vii) there are no recorded historic heritage sites, at the site of the activity; ...</del>
482.22	Lower Aparima Catchment Group	Rule 73	Amend	We suggest you strengthen the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion as appropriate.
506.8	MARSHALL R C	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure.
523.16	MCGREGOR Grant	Rule 73	Support	(The Council will restrict its discretion to the following matters: (i) the quantity and location of the extraction; (ii) any effects on river morphology and dynamics (including erosion or deposition), any <u>positive effects on the physical environment</u> , aquatic and riverine ecosystems and habitat, historic heritage and the spiritual and cultural values and beliefs of the tangata whenua.
544.4	MCLEOD Bruce & Cynthia	Rule 73(b)	Support	Environment Southland must be proactive in removing gravel build-ups in river channels. (Ref. Southland Regional Council publication no. 2007-01.)
570.20	MILLER R L & S J Farm Trust	Rule 73	Support in part	Increase the extraction limit to 500m <sup>3</sup> per year.
614.34	NZ Transport Agency	Rule 73	Support Amend	Environment Southland will restrict its discretion to the following matters: 1.the quantity and location of the extraction; 2. any effects on river morphology and dynamics (including erosion or deposition), aquatic and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				riverine ecosystems and habitat, taonga species, historic heritage and the spiritual and cultural values and beliefs of the tangata whenua; <u>3. any positive effects on the physical environment resulting from the extraction.</u> <u>4. Any potential adverse effect on network utilities in the vicinity of the extraction site</u>
622.30	P F Olsen Ltd	Rule 73	Support Amend	Amend the rule to make the allocation per unit area of land.
645.8	PRICE William	Rule 73	Amend	Review rule to allow gravel extraction for flood & erosion mitigation, but not within 100 metres of a bridge structure.
667.10	Riverfield Farms Ltd	Rule 73	Oppose	Amend to allow gravel extraction of less than 120 cubic metres per year over the landholding; or 20 cubic metres per site is a permitted activity. It is covered in Appendix N.
681.23	Rockytommy Farming Ltd	Rule 73	Amend	Include the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
689.8	ROSS Keith	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure.
737.31	Smithill Ltd	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
741.6	South Hughes Farms Ltd	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
752.166	Southland Fish & Game Council	Rule 73	Support Amend	Retain and amend to include: <u>“(xiv) There is no gravel extraction from clear gravel bars; and</u> <u>(xv) The activity does not impede any legal access to the river, modified watercourse, stream or lake.</u>  Amend Rule to: “... Environment Southland will restrict its discretion to the following matters:  5. The quantity and location of the extraction. 6. Any effects on <u>the rate of gravel replenishment, flood risk,</u> river morphology and dynamics (including erosion or deposition), aquatic and riverine ecosystems and habitats

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>(including fish passage), taonga species, historic heritage, and the spiritual and cultural values and beliefs of the tangata whenua, landscape, natural character and amenity values, navigation hazard, and public access and recreation values;</u></p> <p>7. <u>Any conditions in Rule 73(a) that cannot be met.</u></p> <p>(b)...</p> <p><u>“(xi) There is no gravel extraction from clear gravel bars.”</u></p> <p>Amend Rule 73(a) to provide:</p> <p>“ . . .</p> <p>Environment Southland will restrict its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>1. The location of the extraction;</li> <li>2. The design of the works and the quantity of material extracted;</li> <li>3. Any effects on infrastructure, <u>the rate of gravel replenishment,</u> flood risk, river morphology and dynamics (including erosion or deposition), aquatic and riverine ecosystems and habitats <u>(including fish passage), taonga species, historic heritage, and the spiritual and cultural values and beliefs of the tangata whenua, landscape, natural character and amenity values, navigation hazard, and public access and recreation values; and”</u></li> </ol> <p>Insert new numbered bullet point under the above heading:</p> <ol style="list-style-type: none"> <li>4. <u>Any conditions in Rule 73(b) that cannot be met.</u></li> </ol> <p>–In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things:</p> <p><u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.16	Southland River Liaison Committees	Rule 73	Support Amend	<p>The Council will restrict its discretion to the following matters:</p> <ol style="list-style-type: none"> <li>(i) the quantity and location of the extraction;</li> <li>(ii) any effects on river morphology and dynamics (including erosion or deposition), any</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>positive effects on the physical environment</u> , aquatic and riverine ecosystems and habitat, historic heritage and the spiritual and cultural values and beliefs of the tangata whenua.
765.7	Stenkoll Farms Ltd	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
775.8	Stoney Creek Station Ltd	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure.
798.11	TEMPLETON Luke	Rule 73	Amend	Ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion.
799.13	TEMPLETON Peter	Rule 73	Amend	Plan should have stronger regulation of wastewater treatment, septic tanks, sewage systems/discharge, stormwater and industrial effects.
802.34	The 254 Partnership & Gerken Family Trust	Rule 73	Support	Retain.
807.8	The Terraces Ltd	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure.
817.26	Tomogalak Gorge Trust (Jeffery Keen)	Rule 73	Amend	Should be a permitted activity to extract up to 50 c/m/yr so long as removal complies with provisions a(ii) – a(xiii) Rule 73.
818.26	Tomogalak Gorge Trust (John Keen)	Rule 73	Amend	Should be a permitted activity to extract up to 50 m <sup>3</sup> /yr so long as removal complies with provisions a(ii) – a(xiii) Rule 73.
819.24	Tomogalak Gorge Trust (Linzi Keen)	Rule 73	Amend	Should be a permitted activity to extract up to 50c/m/yr so long as removal complies with provisions (a)(ii) – (a)(xiii) Rule 73.
824.8	Tulloch Farm Glendhu Ltd	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure.
825.8	Tulloch McNab Transport Ltd	Rule 73	Amend	Review rule to allow gravel extraction for flood and erosion mitigation, but not within 100 metres of a bridge structure
832.133	VAN GOOL Raewyn	Rule 73	Support	Retain.
861.29	WHITE John Copeland	Rule 73	Amend	We suggest you strengthen the ability to remove gravel from river beds where appropriate to reduce river and stream bank erosion as appropriate.
868.28	Wilkins Farming Ltd	Rule 73	Support in part	Amend Rule 73 to allow the extraction of gravel for farming purposes, as a permitted activity. We suggest that gravel extraction should be taken on a case by case basis that captures the

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				environmental benefit of managing aggrading gravel levels and river containment as well as economic benefits. Amend Rule 73 (a) (i) .... Less than 500m3/year.
877.66	WILSON Aaron	Rule 73	Support	Retain.
880.71	WILSON Shannon	Rule 73	Support	Retain.

### Rule 74 - Wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.113	Aratiatia Livestock Ltd	Rule 74	Support	Retain.
101.14	BUCKINGHAM Thomas	Rule 74	Amend	The decision I would like ES to make is to amend the rule to allow a solution to be sorted out between the land owner and the sustainability officer on site at no cost to the owner.
108.103	BYTHELL Jesse	Rule 74		I seek that when considering discretionary activities defined in clause 74(b) the council have regard for the preservation of the pattern and diversity of the wetland and how any naturally occurring wetlands in the vicinity will be affected by the proposed activity. In addition, I seek clarification on which instances modification of a wetland through grazing is a permitted or discretionary activity.
125.5	CHARTRES Peter	Rule 74	Oppose	Make provision for the continuation of light, low impact grazing by stock in wetlands.
210.93	Director-General of Conservation	Rule 74	Support	Retain.
247.22	Environment Southland	Rule 74	Amend	Amend 74(b) to read: (b) The use of land for the modification of a wetland for the purposes of maintaining or enhancing the wetland, or maintaining or enhancing pedestrian access to the wetland that does not comply with the conditions of Rule 74(4a) is a discretionary activity.
265.104	Federated Farmers of NZ (Southland Province)	Rule 74	Support in part	Delete condition (c). Replace 74(1) with 74(a).
279.106	Forest & Bird NZ	Rule 74	Support with	Amend Rule 74 as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
			minor amendment	<p>The use of land <u>in a manner that is likely to result in</u> modification of a wetland for the modification of a wetland for the purposes of maintaining and enhancing the wetland, or maintaining and enhancing pedestrian access to the wetland (including the construction, maintenance or upgrading of structures), is a permitted activity provided the following conditions are met:</p> <p>(c) The use of land <u>in a manner that is likely to result in</u> modification of a wetland, including through the grazing by stock or drainage, that is not provided for as a permitted activity or a discretionary activity is a non-complying activity.</p> <p>Add: <u>The use of land in a manner that is likely to result in modification of a natural wetland for the modification of a wetland for any other purpose is a prohibited activity.</u></p>
411.35	Invercargill City Council	Rule 74	Oppose in part	Request that a distinction to be made for “manmade” wetlands to allow for modification without the need for resource consent.
457.2	L & M Ashers Waituna Limited	Rule 74		Amend Rule 74(a) to (c) to refer to ‘natural wetland’ instead of just ‘wetland’.
558.14	MCRAE Natalie	Rule 74	Amend	Change the word ‘including’ in Rule 74(c) to ‘excluding’ so that wetlands can be used for stock intermittently.
640.51	Pourakino Catchment Group	Rule 74	Oppose	Amend wording to ‘natural wetland’.
737.32	Smithill Ltd	Rule 74	Amend	Clarify whether this refers to natural wetland or man-made wetlands?
749.76	Southland Conservation Board	Rule 74	Support	Retain.
752.167	Southland Fish & Game Council	Rule 74	Support Amend	<p>Retain Rule 74 as notified with the following amendments.</p> <p>Amend Rule 74(c) to provide:</p> <p>“(c) The use of land for the modification of a wetland, including through the grazing by stock, <u>diversion of water or</u> drainage, that is not provided for as a permitted activity or a discretionary activity is a non-complying activity.</p> <p>And</p> <p>Insert new alphabetical bullet point:</p> <p><u>(d) Despite (a) – (c), the diversion of water from a regionally significant wetland listed in</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Appendix A for land drainage purposes is a prohibited activity.</u>
797.51	Nga Runanga and TRONT	Rule 74	Support in part	Amend Rule 74 to include: <u>Wetlands</u> d.) <u>The draining of any natural wetland is a prohibited activity.</u>
810.50	Three Rivers Catchment Group (TRCG)	Rule 74	Oppose	Amend wording to 'natural wetland'.
832.134	VAN GOOL Raewyn	Rule 74	Support	Retain
877.67	WILSON Aaron	Rule 74	Support in part	Change Rule 74(a)(1) to state; "The modification only results in minor damage and limited removal of any indigenous vegetation unless that vegetation was planted."
880.72	WILSON Shannon	Rule 74	Support in part	Change Rule 74(a)(l) to state: "the modification only results in minor damage and limited removal of any indigenous vegetation unless that vegetation was planted."
897.2	TNZ Growing Products Ltd	Rule 74	Amend	Amend to: (c) The use of land for the modification of a wetland, including through the grazing by stock or drainage, that is not provided for as a permitted activity or a discretionary activity is a <u>discretionary non-complying</u> activity.

### Rule 75 – Vegetation flood debris removal

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.40	BRENTLEIGH Family Trust	Rule 75	Support	Retain.
108.104	BYTHELL Jesse	Rule 75		I seek the addition of the following clause in Rule 75 (a), 'there shall be no damage or destruction of significant indigenous vegetation.'
205.36	Dillon Ag Ltd (Chris Dillon)	Rule 75	Support	Retain.
206.36	Dillon Ag Ltd	Rule 75	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Rochelle Dillon)			
233.30	DYSON Valerie &Glyn	Rule 75	Support	Retain.
247.23	Environment Southland	Rule 75	Amend	Amend Rule 75 as follows: Rule 75 – Vegetation flood debris <sup>9</sup> removal (a) The removal of vegetation flood debris obstructing water flow, <u>including plants dislodged and transplanted during flood flows</u> , from any river, modified watercourse, or lake bed and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met...
258.23	Eyre Creek Ltd	Rule 75	Support	Retain.
372.29	Heritage NZ	Rule 75	Support in part Amend	Retain Rule 75(a)(viii).
449.38	KiwiRail Holdings Ltd (KiwiRail)	Rule 75	Amend	Amend as follows: Rule 75 – Vegetation flood debris removal (a) The removal of vegetation flood debris obstructing water flow from any river, modified watercourse, or lake bed and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(viii) there are no recorded historic heritage sites, at the site of the activity; ...</del>
603.16	Nithdale Station	Rule 75	Support	Retain.
614.35	NZ Transport Agency	Rule 75	Support Amend	Rule 75 – Vegetation flood debris removal (a) The removal of vegetation flood debris <u>or live vegetation</u> obstructing water flow from any river, modified watercourse, or lake bed and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: (a) The removal of vegetation flood debris obstructing water flow from any river, modified watercourse, or lake bed and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:

<sup>9</sup> Refer to the Glossary for the definition of “Vegetation flood debris”.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(i) the removal of the material is for the purpose of flood or erosion control or maintaining the integrity of infrastructure;</p> <p>(ii) following the removal of material, the area of lake bed, modified watercourse or river which has been disturbed, shall be returned as near as practicable to its original channel shape, area, depth and gradient;</p> <p>(iii) fish passage shall not be impeded as a result of the activity;</p> <p>(iv) there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</p> <p>(v) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discolouration to the river or lake. Where any sediment release occurs, it will be only temporary;</p> <p>(vi) no fuel storage or machinery refuelling shall occur on any area of the bed;</p> <p>(vii) no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</p> <p><del>(viii) there are no recorded historic heritage sites, at the site of the activity;</del></p> <p>(ix) before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</p> <p>(x) all equipment, machinery, operating plant and debris associated with the bed disturbance activity shall be removed from the site on completion of the activity; and</p> <p>(xi) from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level.</p>
752.168	Southland Fish & Game Council	Rule 75	Support in part	<p>Retain.</p> <p>–In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things:</p> <p><u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
795.5	TAYLOR George	Rule 75	Amend	Some flexibility is required. Discolouration of waterways in times of high rainfall should not potentially be an offence.
802.35	The 254 Partnership &	Rule 75	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Gerken Family Trust			
832.135	VAN GOOL Raewyn	Rule 75	Support	
868.29	Wilkins Farming Ltd	Rule 75	Support	Retain.
877.68	WILSON Aaron	Rule 75	Support	Retain.
880.73	WILSON Shannon	Rule 75	Support	Retain.
891.1	YORKE Bradley	Rule 75	Amend	Amend to clarify that when performing these tasks on behalf of Environment Southland, accreditation is or is not required.

#### Rule 76 – Vegetation planting

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.114	Aratiatia Livestock Ltd	Rule 76	Support	Retain.
62.14	Beef + Lamb NZ	Rule 76	Support in part Amend	Amend Rule 76 to read: The introduction or planting of any plant, or part of any plant, in the bed of any lake, river, or modified watercourse is a permitted activity, provided the following conditions are met:  <del>(i) the planting is undertaken pursuant to a Riparian Management Plan or a Management Plan prepared in accordance with Appendix N;</del> <del>(ii) the planting is not production forestry;</del> <del>(iii) no plants listed in the Regional Pest Management Strategy for Southland 2013 are introduced or planted.</del>  (b) ...
89.41	BRENTLEIGH Family Trust	Rule 76	Oppose	Don't encourage riparian planting on streams as their roots clog tile drains.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
101.15	BUCKINGHAM Thomas	Rule 76	Amend	Amend the rule to allow the farm owner and the sustainability officer to sort it out at no cost to the owner.
108.105	BYTHELL Jesse	Rule 76		I seek the addition of the following clause in Rule 76 (b), 'there shall be no damage or destruction of significant indigenous vegetation,' and 'any native species planted do not adversely affect the long-term viability of the indigenous plant communities already present;'
209.46	DIPROSE Dave	Rule 76	Support	Retain.
210.94	Director-General of Conservation	Rule 76	Support in part	Retain Rule 76 with the following amendments; Insert a new condition in paragraph (a); <u>(iv) no planting is undertaken on bare gravel bars.</u> Amend (b)(ii) to read: (ii) there shall be no bed disturbance of <u>any bare gravels that can be used as</u> roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;
247.24	Environment Southland	Rule 76	Amend	Amend Rule 76 as follows: (a) The introduction or planting of any plant, or part of any plant, in the bed of any lake, river, or modified watercourse is a permitted activity, provided the following conditions are met: (i) the planting <del>is</del> is undertaken pursuant to a Riparian Management Plan or a Management Plan, prepared in accordance with Appendix N...  Amend Rule 76(a)(ii), as follows: (ii) the planting is not <del>production</del> forestry <u>primarily for production of wood, fibre, bio-energy and/or non-wood forest products;</u>
258.24	Eyre Creek Ltd	Rule 76	Support	Retain.
279.107	Forest & Bird NZ	Rule 76	Support with minor amendment	Insert a new condition in (a): <u>(iv) no planting is undertaken on bare gravel bars.</u>  Amend (b)(ii) to read: (ii) there shall be no bed disturbance of <u>any bare gravels that can be used as</u> roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;
337.19	Growplan Ltd	Rule 76		Innovation will occur in this area which will change how riparian schemes are designed from

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				fencing design to maintenance. <further comment>
372.30	Heritage NZ	Rule 76	Support in part Amend	Retain Rule 76(b)(viii).
390.35	Horticulture NZ	Rule 76	Support in part	Provide for the removal of vegetation that is infected by unwanted organisms or pest species from both land and within the bed of a river, lake or modified water course as a permitted activity.
523.17	MCGREGOR Grant	Rule 76	Support	(ii) The planting is not production forestry <u>excluding planting for soil conservation and river control purposes.</u>
614.36	NZ Transport Agency	Rule 76	Support	Amend to provide for an exemption for planting of plantation forestry species where it is planted for soil conservation and river control purposes.
731.10	SMITH Barry	Rule 76		Rewrite (iii) to mention ‘Only suitable native plants historically found in the area to be used’.
752.169	Southland Fish & Game Council	Rule 76	Support Amend	Retain and Amend Rule 76(a) to include the following condition: “(iv) <u>No planting is undertaken on bare gravel bars.</u> ”  Amend Rule 76(b) to include the following condition: “(xi) <u>No planting is undertaken on bare gravel bars.</u> ”  –In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things: “ <u>Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.</u> ”
753.17	Southland River Liaison Committees	Rule 76	Support Amend	(ii) the planting is not production forestry <u>excluding planting for soil conservation and river control purposes.</u>
802.36	The 254 Partnership & Gerken Family Trust	Rule 76	Oppose	Don’t encourage riparian planting on streams as their roots clog tile drains.
832.136	VAN GOOL Raewyn	Rule 76	Support	
868.30	Wilkins Farming Ltd	Rule 76	Support	Retain.
869.10	WILKINS Pam	Rule 76	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.69	WILSON Aaron	Rule 76	Support in part	The Water and Land Plan Rule 76(a)(i) should state; “The planting may include production forestry provided harvesting GMPs are followed.”
880.74	WILSON Shannon	Rule 76	Support in part	The W&L plan Rule 76(a)(i) should be amended to state: “the harvesting may include production forestry provided harvesting GMPs are followed.”
891.2	YORKE Bradley	Rule 76	Amend	Amend to clarify that when performing these tasks on behalf of Environment Southland, accreditation is or is not required.

### Rule 77 – Vehicles and machinery

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
10.5	Aggregate & Quarry Association of NZ	Rule 77		Amend rule 77(a) as follows: (i) there shall be no alteration to the original profile of the bed <u>unless provided for as a gravel extraction activity under Rule 73:...</u> ; (iv) any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake <u>unless provided for as a gravel extraction activity under Rule 73</u> . Where any sediment release occurs, it will be only temporary; (v) any bed disturbance shall be kept to the minimum necessary to undertake the activity and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation) <u>unless provided for as a gravel extraction activity under Rule 73</u> ;
40.14	BAKER David	Rule 77	Support	Retain.
108.106	BYTHELL Jesse	Rule 77	Support	I seek the addition of the following clause in Rule 77(a), ‘there shall be no damage or destruction of significant indigenous vegetation, including turf communities’.
152.28	Clover Bell Ltd	Rule 77	Support	Retain.
209.47	DIPROSE Dave	Rule 77	Support	Retain.
250.9	ESLER Lloyd	Rule 77		The rule prohibits various activities but does not specifically state that recreational 4WD, quad bike or motorbike off-road recreation is prohibited.
258.25	Eyre Creek Ltd	Rule 77	Support	Retain.
279.108	Forest & Bird NZ	Rule 77	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
325.2	GLOVER A F & C M Family Trust	Rule 77	Support	Retain.
372.31	Heritage NZ	Rule 77	Support in part Amend	Retain Rule 77(a)(viii).
449.39	KiwiRail Holdings Ltd (KiwiRail)	Rule 77	Amend	Amend as follows: Rule 77 – Vehicles and machinery (a) The entry into or passage across the bed of any river, modified watercourse, or lake by any wheeled or tracked vehicle or machine and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(viii) there are no recorded historic heritage sites, at the site of the activity; ...</del>
523.18	MCGREGOR Grant	Rule 77	Support	Retain.
612.5	NZ Fire Service Commission	Rule 77	Amend	Amend Rule 77 as follows by adding: (a) ..... (i) (xii) <u>it is a fire appliance vehicle responding to an emergency.</u>
614.37	NZ Transport Agency	Rule 77	Support	Retain.
640.52	Pourakino Catchment Group	Rule 77	Support	Retain.
697.17	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 77	Support	Retain.
752.170	Southland Fish & Game Council	Rule 77	Support Amend	Retain and amend Rule 77(a) to include the following condition: (xii) <u>The activity does not impede any legal access to the river, modified watercourse, stream or lake.</u>  Amend Rule 77(b) to provide: “Environment Southland will restrict its discretion to the following matters:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ol style="list-style-type: none"> <li>1. The location, type of vehicle or machine and frequency and duration of the activity;</li> <li>2. Any effects on water quality, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats (<u>including fish passage</u>), <u>the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, landscape, natural character and amenity values, and public access and recreation values;</u></li> <li>3. Any <del>The</del> conditions in Rule 77(a) that cannot be met.</li> </ol> <p>–In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things:  <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.18	Southland River Liaison Committees	Rule 77	Support	Retain.
810.51	Three Rivers Catchment Group (TRCG)	Rule 77	Support	Retain.
832.137	VAN GOOL Raewyn	Rule 77	Support	
868.31	Wilkins Farming Ltd	Rule 77	Support	Retain.
877.70	WILSON Aaron	Rule 77	Support	Retain.
880.75	WILSON Shannon	Rule 77	Support	Retain.

### Rule 78 – Weed and sediment removal for drainage maintenance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.115	Aratiatia Livestock Ltd	Rule 78	Support	Retain.
31.12	AYERS Warren	Rule 78	Support	Retain.
108.107	BYTHELL Jesse	Rule 78		I seek the addition of the following clause in Rule 78(a), ‘there shall be no damage or destruction of significant indigenous vegetation,’ and ‘the bed of the modified watercourse is not lowered where it will affect groundwater levels in adjacent naturally occurring wetlands.’

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
137.5	CLARKE B D & H J Partnership (Brendon Clarke)	Rule 78	Support	Retain.
138.5	CLARKE B D & H J Partnership (Hayley Clarke)	Rule 78	Support	Retain.
140.4	CLARKE Julie	Rule 78	Support	Retain.
141.7	CLARKE Julie Ann & TUCK Roger	Rule 78	Support	Retain.
152.29	Clover Bell Ltd	Rule 78	Support	Retain.
209.48	DIPROSE Dave	Rule 78	Support	Retain.
210.95	Director-General of Conservation	Rule 78	Support in part	<p>Amend Rule 78 to read;</p> <p><u>Rule 78 – Weed and <del>sediment</del> mud removal for drainage maintenance</u></p> <p>(a) The removal of aquatic weeds and plants and <del>sediment</del> <u>mud</u> from any modified watercourse for the purpose of maintaining or restoring drainage outfall and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</p> <p>(i) the activity shall be undertaken solely to maintain or restore the drainage capacity of a modified watercourse that has previously been modified or maintained for drainage maintenance/restoration purposes at that location;</p> <p>(ii) the activity shall be restricted to the removal of aquatic weeds and plants and/or <del>sediment</del> <u>mud</u> deposits for drainage maintenance/restoration purposes;</p> <p>(iii) any incidental bed disturbance and removal of gravel shall be only to the extent that it is necessary to undertake the activity and shall be kept to the absolute minimum <u>and the gravel removed shall comprise not more than 5% of the total sediment removed</u> ;</p> <p>(iv)-(xiii) Retain as notified.</p> <p><u>(xiv) the modified watercourse is not a habitat of Gollum or alpine galaxias as shown in the Appendix of this submission.</u></p> <p>Retain (b) as notified</p>
214.18	Donald Farm	Rule 78	Support	Retain.
258.26	Eyre Creek Ltd	Rule 78	Support	Retain.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.105	Federated Farmers of NZ (Southland Province)	Rule 78	Support in part	Delete Rule 78 (a)(x) and replace with: <u>‘There are no registered archaeological sites or wāhi tapu sites listed in this plan located in the bed of the watercourse within 100m of where the activity is to be undertaken.’</u>
270.6	Firdale Farms Ltd	Rule 78	Support.	Retain.
279.109	Forest & Bird NZ	Rule 78	Support with amendments	Amend Rule 78 as follows: (iii) any incidental bed disturbance and removal of gravel shall be only to the extent that it is necessary to undertake the activity and shall be kept to the absolute minimum <u>and the gravel removed shall comprise not more than 5% of the total sediment removed ;</u> <u>(xiv) the modified watercourse is not a habitat of threatened native fish</u> <u>Add schedule to identify habitats of threatened native fish</u>
313.12	GILLESPIE Maria	Rule 78	Support	Retain.
351.6	HAMILTON Rosemary	Rule 78		Remove dates and should be left as a good management practice.
372.32	Heritage NZ	Rule 78(a)(x)	Amend	Amend Rule 78(a)(x) as follows: (x) there are no known <del>archaeological sites or wāhi tapu</del> in the bed, at the site of the activity. In the event of the discovery of a site of potential historical or cultural importance (for example, archaeological site or wāhi tapu), the activity shall cease and Environment Southland’s Director of Policy, Planning and Regulatory Services shall be informed immediately. The activity may not recommence without the permission of the Director of Policy, Planning and Regulatory Services <u>who will consult with Heritage New Zealand Pouhere Taonga, and where the site is of Māori origin the relevant runanga, before providing permission;</u>
387.21	HORRELL Andrew Russell	Rule 78	Support	Retain.
411.36	Invercargill City Council	Rule 78	Support	Retain.
449.40	KiwiRail Holdings Ltd (KiwiRail)	Rule 78	Amend	Amend as follows: Rule 78 – Weed and sediment removal for drainage maintenance (a) The removal of aquatic weeds and plants and sediment from any modified watercourse for the purpose of maintaining or restoring drainage outfall and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met: ... <del>(x) there are no known archaeological sites or wāhi tapu in the bed, at the site of the activity. In the event of the discovery of a site of potential historical or cultural importance (for example,</del>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				archaeological site or wāhi tapu), the activity shall cease and Environment Southland's Director of Policy, Planning and Regulatory Services shall be informed immediately. The activity may not recommence without the permission of the Director of Policy, Planning and Regulatory Services; ...
523.19	MCGREGOR Grant	Rule 78	Support	Retain.
560.13	MCRAE Tim & Justine	Rule 78	Support	Retain.
570.21	MILLER R L & S J Farm Trust	Rule 78	Support	Retain.
603.17	Nithdale Station	Rule 78		I propose that the wording also includes 'natural watercourses' and that Rule 78 be expanded to not only include drainage maintenance but maintenance to prevent sheep from getting stuck.
614.38	NZ Transport Agency	Rule 78	Support	Retain.
640.53	Pourakino Catchment Group	Rule 78	Support	Retain.
666.27	Rimu Grasslands Ltd & Leicester Downs Ltd	Rule 78	Support	Retain.
697.18	Rural Contractors of NZ Incorporated (Linda Stalker)	Rule 78	Support	Retain.
698.6	Rural Contractors of NZ (Graeme Mathieson)	Rule 78	Support	Retain.
721.5	SHEARING Dean	Rule 78	Amend	No restriction on dates in Rule 78(a)(vii).
723.4	SHEARING Raymond	Rule 78	Amend	No restriction on dates in Rule 78(a)(vii).
723a.4	SHEARING Euan & Lisa	Rule 78	Amend	No restriction on dates in Rule 78(a)(vii).
752.171	Southland Fish & Game Council	Rule 78	Oppose	Amend to: <b>“Weed and sediment removal for drainage maintenance</b> (a) The removal of aquatic weeds and plants and sediment from any modified watercourse for the purpose of maintaining or restoring drainage outfall and any associated bed disturbance and discharge resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(i) the activity shall be undertaken solely to maintain or restore the drainage capacity of a modified watercourse that has previously been modified or maintained for drainage maintenance/restoration purposes at that location;</p> <p>(ii) the activity shall be restricted to the removal of aquatic weeds and plants and / or sediment deposits for drainage maintenance / restoration purposes <u>and such deposits shall contain less than 5% gravel (&gt;10mm diameter)</u>;</p> <p>(iii) any incidental bed disturbance <del>and removal of gravel</del> shall be only to the extent that it is necessary to undertake the activity and shall be kept to the absolute minimum <u>and shall not result in lowering of the bed below previously modified levels</u>;</p> <p>–In the Rule which create restricted discretionary activity status for bed disturbance activities in river and lake beds should be amended to provide that Council in exercising its discretion will consider, among other things:  <u>“Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value where applicable.”</u></p>
753.19	Southland River Liaison Committees	Rule 78	Support	Retain.
766.13	STEVENS Brendon	Rule 78	Support	Retain.
792.36	TAYLER Matthew	Rule 78	Support	Retain.
797.52	Nga Runanga and TRONT	Rule 78(a)(xiv)- (xv) – new clauses	Support in part	<p>Amend to read:</p> <p><u>Weed and sediment removal for drainage maintenance</u></p> <p>a.) <del>...</del>  <u>(xiv) No activity in relation to drainage maintenance shall result in greater sediment loss to the drain.</u></p> <p><u>(xv) No activity in relation to drainage maintenance shall significantly adversely effect the habitat or health of any taonga species as identified in Appendix M.</u></p>
801.8	Terrace Farm Trust & Johnrey Trust	Rule 78	Support	Retain.
810.52	Three Rivers Catchment	Rule 78	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Group (TRCG)			
822.7	Tremaine Farming Partnership	Rule 78	Support	Retain.
832.138	VAN GOOL Raewyn	Rule 78	Support	
866.6	WILKINS Brendan	Rule 78	Support	Retain.
868.32	Wilkins Farming Ltd	Rule 78	Support	Retain.
869.11	WILKINS Pam	Rule 78	Support	Retain.
877.71	WILSON Aaron	Rule 78	Support	Retain.
880.76	WILSON Shannon	Rule 78	Support	Retain.
891.3	YORKE Bradley	Rule 78	Amend	Cleaning drains as a contractor on behalf of landowner, clarify whether there are accreditation levels and if so, who sets the level?

### Rule 79 – High country burning

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
50.1	BARKER Rodney	Rule 79	Oppose	There needs to be tighter regulation on rural burning of waste material and scrub.
108.108	BYTHELL Jesse	Rule 79	Oppose	I seek assurance that no burning will be permitted in Zone C and B unless the landowner can demonstrate that any significant indigenous plants or native fauna present within or close to the proposed burn area are not at risk of damage or destruction.  I seek that burning above 800m be a prohibited activity.
118.12	Carmyllie Farm	Rule 79	Neutral	Burning can be a big part of weed and pest control so that needs to be looked over closely.
156.14	COCKBURN Grant &	Rule 79	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Rachel			
210.96	Director-General of Conservation	Rule 79	Oppose	Delete.
247.25	Environment Southland	Rule 79	Amend	Add new Rule 79(c)(ii): <u>(ii) biodiversity values.</u>
249.32	Ernslaw One Ltd	Rule 79	Support	Retain.
258.27	Eyre Creek Ltd	Rule 79	Support	Retain.
265.106	Federated Farmers of NZ (Southland Province)	Rule 79	Oppose	Delete.
279.110	Forest & Bird NZ	Rule 79	Oppose	Delete.
290.5	G A Young & Co Ltd	Rule 79	Support	Consents must not be unreasonably withheld, as still a necessary activity to be used occasionally.
341.12	Gunton Farms Ltd (Jeremy Gunton)	Rule 79	Support	Retain Rule 79(a)(b)(c).
464.30	Landpro Ltd	Rule 79	Support in part	Seek that the rule is amended to make burning in Zone A, or in Zone B between 1 October and 30 April a Permitted Activity where one or more of the other approvals listed have been obtained. Recommend that ES include the Fire Hazard Zone on the GIS.
590.17	Mt Linton Station	Rule 79	Support	Retain.
604.13	Nokomai Station Ltd	Rule 79	Support in part	Seek that the rule is amended to make burning in Zone A, or in Zone B between 1 October and 30 April a Permitted Activity where one or more of the other approvals listed have been obtained. Recommend that ES include the Fire Hazard Zone on the GIS.
612.6	NZ Fire Service Commission	Rule 79	Amend	Amend Rule 79 as follows: (c) The use of land for burning..... (i)..... (2) a permit for burning in the hill and high country from the Rural Fire Authority or <u>its successor organisation</u> ; or
622.31	P F Olsen Ltd	Rule 79	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
705.4	SALLIS Robin	Rule 79	Support	I support the rule but I believe the rule should go further and burning in the high country should be a non-complying activity.
746.1	Southern Rural Fire Authority	Rule 79	Amend	Rule 79 (c) - Change burning in Zone A and B to between 1 May – 30 October to allow land owners to burn.  Remove Rule 79 (c)(i) as the rule does not apply in Southland.
749.77	Southland Conservation Board	Rule 79	Amend	The aerial extent of Zones A, B and C needs to be clarified across the whole region (if the maps have not been widely or properly ‘published’ a further opportunity to submit may be necessary.
752.172	Southland Fish & Game Council	Rule 79	Oppose	Delete.
832.139	VAN GOOL Raewyn	Rule 79	Support	Retain.
868.33	Wilkins Farming Ltd	Rule 79	Support	Retain.
869.12	WILKINS Pam	Rule 79	Support	Retain.
872.3	William J Watt Consulting Ltd	Rule 79	Amend	The documentation that formed the basis for the ‘official’ public notification of the Plan needs to be checked to ensure all relevant maps are included. The Council needs to consider whether it is open to challenge if all relevant information was not widely published.
877.72	WILSON Aaron	Rule 79	Support	Retain.
880.77	WILSON Shannon	Rule 79	Support	Retain.

### New rule required

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
33.8	BACON V M	New rule	Support in part Amend	A rule added to the plan so landowners can seek a reclassification of incorrect physiographic zones. This could include, that a landowner notifies the council of incorrect physiographic zones on their property, council arranges for independent investigation, if the consultant finds the physiographic zone was correctly classified then it stays the same, if the consultant finds the physiographic zone was incorrectly classified then Environment Southland would amend the maps relating to that part of the property.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
87.4	Braemore Farms Ltd	New rule	Amend	Include a rule that provides for the reclassification of incorrect Physiographic Zones. A combination of physiographic and good farm management practices be encouraged. More science with a peer review be completed.
92.15	Bristol Grove Dairies	New rule		Include a rule regarding the urban population discharging wastewater (washing vehicles, rinsing containers or other grey water) into storm water drains. This activity needs to be controlled or prevented from happening as it degrades fresh water quality.
131.3	CHRISTIE William	New provision - Pest Management	Support	Include a new provision that requires more vigilance re: ragwort control in upper areas of Waikaia river so seed deposit is less in lower lying areas downstream.
189.45	Dairy Holdings Ltd	New rule		<p>Include a new rule:</p> <p><u>Nutrient User Groups</u></p> <p><u>[x] The use of land for a farming activity on a property that forms part of a Nutrient User Group is a discretionary activity, provided the following conditions are met:</u></p> <ol style="list-style-type: none"> <li>1. <u>A management plan is submitted with the application for resource consent, which sets out:</u> <ol style="list-style-type: none"> <li>a. <u>the properties forming the Nutrient User Group; and</u></li> <li>b. <u>a map showing the location of all properties forming part of the Nutrient User Group; and</u></li> <li>c. <u>the legal description of all properties and the legal names of the property owners forming part of the Nutrient User Group; and</u></li> <li>d. <u>the method by which nitrogen losses will be managed and accounted for within the Nutrient User Group; and</u></li> <li>e. <u>the method by which nitrogen losses will be redistributed upon any property or any part of any property withdrawing from the Nutrient User Group; and</u></li> </ol> </li> </ol> <p><u>A Management Plan has been prepared for each property in the Nutrient User Group in accordance with Appendix N and is submitted with the application for resource consent.</u></p>
351.7	HAMILTON Rosemary	New rule - Household on-site wastewater systems		There needs to be a rule and a timeframe for this work to be done. The implementation of waste systems in new dwellings should meet the current NZ building standards effective immediately.
372.33	Heritage NZ	New provision - Accidental Discovery		New provision sought: Accidental Discovery Protocol – see submission for further detail.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		Protocol		
482.23	Lower Aparima Catchment Group	New rule	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.
553.12	McPhelzo Trust (C G & M P Pullar)	New rule	Support in part	<p>Add a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation - i.e. a consultant completes the investigation funded by Council</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of the property.</p>
554.13	McPhelzo Trust (Z, E & P Pullar)	New rule	Support in part	<p>Add a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation - i.e. a consultant completes the investigation funded by Council</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of the property.</p>
562.24	Meridian Energy Ltd	New Rule – discharge of water and contaminant (construction)		<p><b>Insert</b> new Rules to read:</p> <p><u>Rule X</u></p> <p><u>(a) Temporary discharges to water or to land in circumstances where a contaminant may enter water associated with infrastructure construction, maintenance and repair is a permitted activity, provided the following condition is met:</u></p> <p>1. <u>The discharge is temporary and only of sediment, organic material and water</u></p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p style="text-align: center;"><u>originating from within the bed and margins of the lake or river.</u></p> <p>(b) <u>The temporary discharge to water or to land in circumstances where a contaminant may enter water associated with infrastructure construction, maintenance and repair that does not meet the condition in Rule X(a) is a restricted discretionary activity.</u></p> <p><u>Environment Southland will restrict its discretion to the following matter:</u></p> <ol style="list-style-type: none"> <li><u>1. any effects on flood risk, river, modified watercourse, or lake morphology and dynamics (including erosion or deposition), and aquatic and riverine ecosystems and habitat.</u></li> </ol>
562.25	Meridian Energy Ltd	New Rule - Take, use, dam and divert Water (Construction Purposes)		<p><b><u>Insert</u></b> a new rule to read:</p> <p><u>New Rule X1</u></p> <p><u>The taking, use, damming and diversion of water from a river, lake or an artificial watercourse for infrastructure construction, maintenance and repair is a permitted activity, provided the following conditions are met:</u></p> <ol style="list-style-type: none"> <li><u>1. The take and use does not exceed 15 L/s and 100 m3 per day; and</u></li> <li><u>2. The take and use is for no longer than 2 months; and</u></li> <li><u>3. The take does not at any time exceed 10% of the flow at the point of take; and</u></li> <li><u>4. Where the take is from a water body with a minimum flow set, the take or diversion ceases when the flow is at or below the minimum flow; and</u></li> <li><u>5. The take is not from a wetland; and</u></li> <li><u>6. Fish are prevented from entering the water intake; and</u></li> <li><u>8. The take is not from any river or part of a river that is subject to a Water Conservation Order.</u></li> </ol> <p><u>Rule X1B</u></p> <p><u>Any take, use, dam, divert of water that does not meet the condition of Rule X1 is a discretionary activity.</u></p>
603.18	Nithdale Station	New rule		<p>In areas where there are waterbodies with slopes under 16 degrees (that aren't also in steeper blocks) there is no requirement to exclude cattle from them by May 2018. However, a plan of fencing that is required to exclude cattle from these areas is to be made available to Environment Southland by 1 May 2018 showing priorities and time frame for this to be achieved (up until 2025). This will also take into account the farmers ability to fund this. Any subsidy available from Environment Southland will help.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Interim mitigating factors could be included in the Farm Management Plan (these could include grazing intensity and stock management factors).
603.19	Nithdale Station	New rule - in relation to Rule 38		I propose a ruling similar to the discharge of fertiliser where discharge requiring consent is related to soil moisture field capacity.
612.7	NZ Fire Service Commission	New Rule – discharges to surface waterbodies or other water for fire-fighting emergency response and training	Amend	<p>Preferred addition to Plan – Amend to include new rule as follows:</p> <p><b><u>Rule X - Discharges to surface waterbodies or other water for fire-fighting emergency response and training</u></b></p> <p><u>The discharge of contaminants or water to surface waterbodies or other water resulting from firefighting emergency response and training activities is a permitted activity. For clarity Rules 5, 6, 7, and 8 do not apply to fire-fighting for emergency response and training activities which are a permitted activity.</u></p> <p>Alternative less preferred addition to Plan – Amend to include the following at the end of each of Rules 5, 6, 7 and 8:</p> <p><u>For clarity the discharge of contaminants or water to surface waterbodies or other water resulting from fire-fighting emergency response and training activities is specifically excluded from having to comply with this rule and is a permitted activity.</u></p>
642.8	PREBBLE Lynden	New rule	Oppose Amend	A rule added into the plan so landowners can seek a reclassification of incorrect physiographic zone(s). This rule could include: The landowner notifies the council of the inaccuracies and the council arranges for the area to be remapped accurately.
643.8	PREBBLE Sandra	New rule	Oppose Amend	As an alternative I propose: A rule added into the plan so landowners can seek a reclassification of incorrect physiographic zone(s). This rule could include: The landowner notifies the council of the inaccuracies and the council arranges for the area to be remapped accurately.
652.9	PULLAR Mary	New rule	Oppose	<p>A rule added into the plan so landowners can seek a reclassification of incorrect physiographic zones. This could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation-i.e. a consultant completes the</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>investigation funded by Council.</p> <ul style="list-style-type: none"> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same.</li> <li>• If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of my property. <ul style="list-style-type: none"> <li>(ii) That ES align and integrate Physiographic Zones and methodologies into acceptable practices and permissible activities with other regions in NZ to ensure products, application rates, farming or business systems mirror what is acceptable NZ wide.</li> </ul> </li> </ul> <p>That ES adopt or integrate nationally or internationally accepted and proved methods/systems into the plan EG ISO# type system.</p>
716.7	SHALLARD Mark & Tania	New rule	Oppose Amend	<p>As an alternative I propose:</p> <p>A rule added into the Plan so landowners can seek a reclassification of incorrect physiographic zones which could include notifying the council of incorrect physiographic zone; the Council arranges for an independent investigation; a consultant completes the investigation funded by Council</p> <p>If the consultant finds the physiographic zone was correct, it stays the same. If the consultant finds the physiographic zone was incorrect, then Environment Southland would amend the maps relating to that part of my property.</p>
752.173	Southland Fish & Game Council	New Rule - Maimais		<p><u>Insert new rule as follows:</u></p> <p><b><u>“Rule X - Maimais</u></b></p> <p><u>(a) Unless otherwise stated in the Plan, the use, placement, erection, alternation or reconstruction of any maimai in, on, or over the bed of any river, modified watercourse, lake or natural wetland, and any associated bed disturbance resulting from the carrying out of the activity, is a permitted activity provided the following conditions are met:</u></p> <ul style="list-style-type: none"> <li>(i) <u>the structure does not exceed 10 square metres in area;</u></li> <li>(ii) <u>the structure is lawfully established;</u></li> <li>(iii) <u>the structure is at least 90 metres from any adjacent maimai;</u></li> <li>(iv) <u>the structure is not listed on the New Zealand Heritage List/Rarangi Korero, and was</u></li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>not constructed prior to 1920;</u></p> <p>(v) <u>fish passage shall not be impeded as a result of the activity;</u></p> <p>(vi) <u>there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</u></p> <p>(vii) <u>any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</u></p> <p>(viii) <u>any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</u></p> <p>(ix) <u>no fuel storage or machinery refuelling shall occur on any area of the bed;</u></p> <p>(x) <u>no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</u></p> <p>(xi) <u>there are no recorded historic heritage sites, at the site of the activity;</u></p> <p>(xii) <u>before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</u></p> <p>(xiii) <u>all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</u></p> <p>(xiv) <u>from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</u></p> <p>(xv) <u>the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</u></p> <p>(xvi) <u>any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable;</u></p> <p>(xvii) <u>the structure does not impede any legal access to the river, modified watercourse, natural wetland or lake.</u></p> <p>(xviii) <u>the structure shall be maintained in a state of good repair.</u></p> <p><u>(b) Unless otherwise stated in this Plan, the alteration or extension of any structure in, on, under or over the bed of any river, modified watercourse, or lake and any associated bed disturbance and discharge resulting from the carrying out of the activity, that does not meet one or more of the conditions of Rule X(a) is a restricted discretionary activity.</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><b><u>Environment Southland will restrict its discretion to the following matters:</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Any effects on flood risk, river morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats (including fish passage), the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, landscape, natural character and amenity values, navigation hazard, and public access and recreation values;</u></li> <li>2. <u>Any conditions in Rule X(a) that cannot be met.</u></li> <li>3. <u>Any outstanding characteristics or features recognised by a Water Conservation Order, including habitat for brown trout and angling amenity value.”</u></li> </ol>
752.174	Southland Fish & Game Council	New Rule – Wetland structures		<p>Insert new rule as follows:</p> <p><b><u>“Rule X – Structures in wetlands for the purposes of maintaining or enhancing the wetland</u></b></p> <p><u>(a) Unless otherwise stated in the Plan, the placement, erection, use, alternation or reconstruction of any structure (including existing structures) in, on, under or over the bed of any natural wetland, and any associated bed disturbance resulting from the carrying out of the activity, for the purposes of maintaining or enhancing a natural wetland is a permitted activity provided the following conditions are met:</u></p> <ol style="list-style-type: none"> <li>(i) <u>the structure is lawfully established;</u></li> <li>(ii) <u>the structure is not listed on the New Zealand Heritage List/Rarangi Korero, and was not constructed prior to 1920;</u></li> <li>(iii) <u>the structure does not result in any reduction in the size of the wetland;</u></li> <li>(iv) <u>the structure does not result in any flooding or ponding on any land owned or occupied by another person;</u></li> <li>(v) <u>fish passage shall not be impeded as a result of the activity;</u></li> <li>(vi) <u>there shall be no bed disturbance of the roosting and nesting areas of the black fronted tern, black billed gull, and banded and black fronted dotterel;</u></li> <li>(vii) <u>any activity in the water shall be kept to a minimum to avoid, as much as practicable, discoloration to the river or lake. Where any sediment release occurs, it will be only temporary;</u></li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(viii) <u>any bed disturbance shall be kept to the minimum necessary to undertake the activity, and shall be returned as near as practicable to its original channel shape, area, depth, or gradient on completion of the activity (with the exception of revegetation);</u></p> <p>(ix) <u>no fuel storage or machinery refuelling shall occur on any area of the bed;</u></p> <p>(x) <u>no contaminants, other than sediment released from the bed, shall be discharged to water during the activity unless allowed by a relevant permitted activity rule or resource consent;</u></p> <p>(xi) <u>there are no recorded historic heritage sites, at the site of the activity;</u></p> <p>(xii) <u>before any equipment, machinery, or operating plant is moved to a new activity site it shall be effectively cleaned to prevent the spread of “pests” or “unwanted organisms” as defined by the Biosecurity Act 1993;</u></p> <p>(xiii) <u>all equipment, machinery, operating plant and debris associated with the structure or bed disturbance activity shall be removed from the site on completion of the activity;</u></p> <p>(xiv) <u>from the beginning of November until the end of May, there shall be no disturbance of the tidal river habitat up to the spring tide level;</u></p> <p>(xv) <u>the structure shall not cause significant erosion of, or deposition on, the surrounding bed or banks;</u></p> <p>(xvi) <u>any build-up of debris against the structure, which may adversely affect flood risk, drainage capacity or bed or bank stability, shall be removed as soon as practicable;</u></p> <p>(xvii) <u>the structure does not impede any legal access to the wetland.</u></p> <p>(xviii) <u>the structure shall be maintained in a state of good repair.</u></p> <p><u>(b) Unless otherwise stated in this Plan, the alteration or extension of any structure in, on, under or over the bed of any wetland and any associated bed disturbance and discharge resulting from the carrying out of the activity that does not meet one or more of the conditions of Rule X (a) is a restricted discretionary activity.</u></p> <p><b><u>Environment Southland will restrict its discretion to the following matters:</u></b></p> <ol style="list-style-type: none"> <li>1. <u>The location of the structure; and</u></li> <li>2. <u>Any effects on flood risk, wetland morphology and dynamics (including erosion and deposition), aquatic and riverine ecosystems and habitats (including fish passage), the spiritual and cultural values and beliefs of the tangata whenua, taonga species, historic heritage, landscape, natural character and amenity values, navigation hazard, and public</u></li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>access and recreation values;</u> 3. <u>Any conditions in Rule X(a) that cannot be met.</u>
786.9	SUTHERLAND Kevin & Ann	New rule	Support Amend	<p>Include a rule into the Plan so landowners can seek a reclassification of incorrect physiographic zones.</p> <p>This rule could include:</p> <ul style="list-style-type: none"> <li>• The landowner notifies the council of incorrect physiographic zone(s) on their property.</li> <li>• The Council arranges for an independent investigation – i.e. a consultant completes the investigation funded by Council</li> <li>• If the consultant finds the physiographic zone was correctly classified by Environment Southland, then it stays the same</li> </ul> <p>If the consultant finds the physiographic zone was incorrectly classified by Environment Southland, then Environment Southland would amend the maps relating to that part of my property.</p>
814.8	Timothy Farms Ltd	New rule	Oppose in part	We think there needs to be some consistency across all industry groups and arable farmers should be included in the plan.
861.30	WHITE John Copeland	New rule	Support in part Amend	We recommend that there is a documented process included in this Plan that details how individuals can appeal/ contest the physiographic zone/s and boundaries that their landholdings have been allocated.
892.6	YOUNG A R & R B Partnership (Andrew Young)	New rule		A rule should be added to the plan so landowners can request a reclassification of incorrect physiographic zones.
893.7	YOUNG A R & R B Partnership (Roseanne Young)	New rule		A rule should be added to the plan so landowners can request a reclassification of incorrect physiographic zones.
895.57	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	New rule		<p>New Rule:</p> <p><b><u>Rule X – Bores or wells for monitoring or geotechnical purposes</u></b></p> <p><u>The use of land, for the installation, maintenance and use of a bore for monitoring or geotechnical investigation is a permitted activity, provided the following the conditions are met:</u></p> <p><u>1. Information on bore location and bore installation (including a bore log and the purpose of the bore) are submitted to Council within 40 working days.</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>2. Contaminants or water are prevented from entering the top of the bore or underlying groundwater by:</u> <u>(a) covering or capping the bore when not in use; and</u> <u>(b) sealing the exterior of the bore (the annulus) from ground level to above the screen or 1m below ground level, whichever is the lesser.</u>

### Financial contributions

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
147.8	CLEMENT Karina	Financial Contributions		Financial Contributions – No financial consent charge for the first five years.
191.13	DALE J M & K B	Financial contributions	Amend	This wording needs to be clarified.
197.10	DEVINE Wade	Financial contributions	Neutral	Financial contributions apart from royalties should be no more than the reasonable cost of providing the service. Fees and levies must not be used to hinder lawful activities and to prevent progress within the rules.
247.26	Environment Southland	Financial contributions	Amend	Delete the Financial Contributions section at pages 102-106 and insert text from Appendix A.
249.33	Ernslaw One Ltd	Financial contributions	Oppose	Withdraw the Landscaping or Planting section in relation to visual amenities.
277.56	Fonterra Co-operative Group Ltd	Financial contributions	Oppose	Relief sought: <ol style="list-style-type: none"> <li>1. Restrict the financial contribution section to those matters over which the regional council has jurisdiction.</li> <li>2. Include an express prohibition against "double dipping" (i.e. ensuring that the Council does not seek financial contributions where the effect has been addressed through development contributions obtained by the regional council or where there is an overlap in function, by a district council).</li> <li>3. Ensure that each method of calculating an appropriate amount expressly recognises any positive effects of the proposal for which consent is sought (including the beneficial effects of any offsetting proposed by the applicant).</li> <li>4. The financial contribution section expressly states that a financial contribution shall not</li> </ol>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				be increased merely because of a consent holder's ability to pay to a larger sum.
279.111	Forest & Bird NZ	Financial contributions - Pages 103-105 Purposes	Support with amendments	Delete the word offset and replace with <u>to compensate</u> – and amend to fix associated grammatical changes as necessary.
288.37	Fulton Hogan Ltd & Southern Aggregates Ltd	Financial contributions	Oppose	Amend to: Circumstances – Where public access to or along rivers or lakes will be permanently limited or prevented by the activity for which consent is granted.  Amend to: Circumstances - Where the activity for which consent is granted is likely to cause or contribute to <u>significant</u> adverse effects on river and lake beds.
483.21	Ludell Ltd	Financial Contributions	Amend	The wording needs to be clarified regarding its intention.
622.32	P F Olsen Ltd	Financial contributions Landscaping or planting/Fencing or screening	Oppose	Delete the Landscaping or Planting section in relation to visual amenities.
752.175	Southland Fish & Game Council	Financial contributions	Support	Retain.
814.9	Timothy Farms Ltd	Financial contributions	Oppose	More clarification is needed here.
825.9	Tulloch McNab Transport Ltd	Financial contribution	Oppose	No specific decision requested.

## Appendix A

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.109	BYTHELL Jesse	Appendix A	Oppose	I seek that the Appendix A be expanded to include all wetlands of regional significance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				irrespective of their land status (i.e. no unnecessary bias should be shown to wetlands which are protected, such as Public Conservation Land or QEII National Trust covenants). I seek that council develops a list of criteria so that all wetlands can be assessed as to whether they are indeed regionally significant.
156.15	COCKBURN Grant & Rachel	Appendix A	Support	More accurately identify the location of the significant wetland on Lagoon Creek.
210.97	Director-General of Conservation	Appendix A	Support in part	<p>Amend Appendix A after consultation to read;</p> <p><u>Regionally significant wetlands</u></p> <p><u>Awarua Plain - Southland Estuaries including:</u></p> <p>Waituna Scientific Reserve</p> <p>Seaward Moss <u>Muddy Creek and adjacent wetlands</u></p> <p>Wetlands adjoining Awarua Bay</p> <p>Wetlands adjoining Bluff Harbour</p> <p>Wetlands adjoining New River Estuary</p> <p><u>Wetlands adjoining Fortrose Harbour (including lower Maitua and Titiroa River catchments wetlands)</u></p> <p><u>Toetoes wetland complex</u></p> <p><u>Aparima catchment</u></p> <p><u>Mt Hamilton Station wetlands</u></p> <p><u>Hamilton Burn Flats wetland)</u></p> <p><u>Centre Burn wetland So Big wetland complex (including Chewings Road bog and Moss Burn wetland)</u></p> <p><u>Braxton Bog</u></p> <p>Waterloo Burn wetland</p> <p><u>Aparima Forks wetland</u></p> <p><u>Aparima Huts wetland complex</u></p> <p><u>Castle Downs Bog (Hamilton Burn),</u></p> <p><u>Jacobs River Estuary</u></p> <p><u>Thornbury Peatland</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Wrights Bush Peatland</u>  <u>Big Lagoon</u>  <u>Long White Lagoon</u></p> <p><u>Fiordland including Fiordland National Park and Te Wāhipounamu South West New Zealand World Heritage Area including</u>  Note there are numerous lakes and river systems which are in natural state and are regionally significant wetlands  Waiuna Lagoon, Big Bay  Pyke Valley (including Lake Alabaster and Lake Wilmott))  <u>Lower Hollyford/Martins Bay wetlands</u>  <u>Transit Valley wetlands</u>  Sutherland Sound  <u>Lake Hauroko Wetland</u>  Back Valley  Grebe Valley</p> <p><u>Stewart Island Rakiura</u>  <u>Freshwater Valley to upper Ruggedy Flats</u>  <u>Island Hill Flats</u>  <u>Rakeahua Valley wetlands</u>  <u>Table Hill</u>  Toetoes Flats</p> <p><u>Waiiau Catchment</u>  <u>Mavora Lakes (and associated wetlands)</u>  <u>Deer Flat wetland, Eglinton Valley</u>  <u>Retford Stream wetland</u>  <u>Bog Lake and Adjacent wetlands</u>  <u>Lake Mistletoe</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Te Anau Downs wetland</u> <u>Pleasant Bay wetland</u> <u>Henry Creek wetland</u> Dunton Swamp <u>Snowdon Forest wetland</u> Takaro wetland <u>Dale bog pine wetland</u> <u>Dome Mire-Dismal swamp-Lake Te Aroha</u> <u>Eweburn Farm wetlands</u> <u>Lookout Hill wetland</u> <u>Sinclair Road</u> Dale Lake and wetland <u>Big Bite (Glen Echo Station)</u> <u>Lake Echo-Lady Burn-Dale Creek</u> <u>Mt Prospect Road wetlands</u> Kākāpō Swamp <u>Dawson City/Mt Prospect wetlands</u> Lake Luxmore <u>Waiau Terrace wetland</u> <u>Rainbow Reach oxbow lake wetland</u> <u>Balloon Loop, Waiau River</u> AmoeboidSwamp, Kepler Tack Kepler Mire <u>Home Creek Wildlife Management Reserve</u> <u>Freestone Hill wetland</u> <u>Lake Rakatu/Back Valley/Richters Rock wetland complex</u> Redcliffe Reserve <u>Rakatu Wetlands</u> <u>Waiau Valley/Borland Burn wetlands (two separate wetlands)</u> <u>Borland Mire</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Grebe Valley wetlands  <u>Borland Saddle-Mt Burns</u>  Chocolate Swamp, Dean Forest  <u>Hindley Burn wetland, Lillburn Valley</u>  <u>Lillburn wetland</u>  <u>Wairaki Lagoon</u>  <u>Leitham Burn wetland</u>  <u>Wairaki River wetland</u>  <u>Sharp Ridge wetland</u>  Feldwick wetlands  <u>Blue Bottle Swamp,</u>  <u>Morley Stream wetland</u>  <u>Waiau Lagoon, Waiau River mouth</u>  Lake George  <u>Lake Thomas</u>  Te Waewae Lagoon  Lagoon Creek Wildlife Management Reserve</p> <p><u>Others wetlands for consideration:</u>  <u>Upper Mararoa (Boundary Hut) wetland</u>  <u>Old Man Swamp</u>  <u>Stony Creek wetland</u>  <u>Ramparts Scenic Reserve</u>  <u>Home Creek (Waiau Trust) wetland</u>  <u>Upper Lillburn Valley wetland</u></p> <p><u>Oreti Catchment</u>  <u>Hidden Burn wetland (upper Oreti Valley)</u>  <u>Upper Oreti valley</u>  <u>Wash Creek wetland</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p> <u>Weydon Burn</u>  <u>Dunearn wetland</u>  <u>Drummond Swamp</u>  <u>Taramoa peatland</u>  <u>Otakau Stream wetland</u>  <u>Lake Murihiku</u>  <u>Oreti Beach coastal turf/wetland</u>  <u>Ferry Road /Oreti Beach lagoon</u>  <u>Oreti Beach gravel ponds</u>  <u>Lower Waihopai River rushland</u>  <u>Lower Hogkinson Road peatland</u>  <u>Hokonui south-east peatland</u>  <u>Grove Bush peatland</u>  <u>Makarewa peatland</u>  <u>Taylor Road wetland</u>  <u>Titipua Stream tussockland</u>  <u>Pebbly Hills swamp</u>  <u>Cross Road swamp</u>  <u>College Stream swamp</u>  <u>Southdowns swamp</u>  <u>Downs Road North tussockland</u>  <u>Brydone West tussockland</u>  <u>Downs Road tussockland</u>  <u>Spurhead swamp</u> </p> <p> <u>Others wetlands for consideration:</u>  <u>West Dome Stn wetland</u>  <u>Mataura Catchment</u>            Five Mile swamp_(wetland in ancient Lake Wakatipu lake outlet)            Nokomai <u>Mount Tennyson</u> stringbog system (Dome Burn and Roaring Lion Creeks)         </p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Garvie Mtn Lakes and associated wetlands  Blue Lake wetland  Gow Lake wetland  Scott Lake wetland  <u>Glenaray Station alpine wetlands (with Welshmans, Upper Waikaia West Branch and Upper Waikaia East Branch catchments</u>  <u>Campbell's Creek wetlands</u>  <u>Pukerau Red tussock Scientific Reserve</u>  Lake Vincent  Lake Brunton Otarā  <u>Waipapa Beach dune slack wetlands</u>  <u>Lake Cook and wetland</u>  Haldane estuary and adjacent wetlands  The Reservoir</p> <p><u>Waikawa Harbour margins</u></p> <p><u>Waimatuku Catchment</u>  <u>Big and Little Bayswater Bog</u>  Drummond Peat Swamp (Isla Bank)  <u>Waimatuku Peatland</u>  <u>Big Lagoon</u>  <u>Waimatuku Estuary</u>  So Big Lagoon  <u>Others wetlands for consideration:</u>  <u>ES Mātaura Flood Plain wetland</u></p>
279.112	Forest & Bird NZ	Appendix A	Support with amendments	<p>Add list of wetlands in Appendix One of this submission to Appendix A.</p> <p><b>Regionally significant wetlands for inclusion in Appendix A – Regionally Significant Wetlands in Southland</b></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Include the following definition in Appendix A and the Glossary of the pWLP:</p> <p>“<b>Regionally significant wetlands</b> means wetlands identified in Appendix A (Regionally Significant Wetlands in Southland) <b>and</b> any natural wetland with indigenous vegetation cover.”</p> <p><b>Named regionally significant wetlands</b></p> <p><b><u>Awarua Plain - Southland Estuaries including:</u></b>  Waituna Scientific Reserve  Seaward Moss Muddy Creek and adjacent wetlands  Wetlands adjoining Awarua Bay  Wetlands adjoining Bluff Harbour  Wetlands adjoining New River Estuary  <u>Wetlands adjoining Fortrose Harbour (including lower Maitara and Titiroa River catchments wetlands)</u>  <u>Toetoes wetland complex</u></p> <p><b><u>Aparima catchment:</u></b>  <u>Mt Hamilton Stationn wetlands</u>  <u>Hamilton Burn Flats wetland</u>  <u>Centre Burn wetland So Big wetland complex (including Chewings Road bog and Moss Burn wetland)</u>  <u>Braxton Bog</u>  <u>Waterloo Burn wetland</u>  <u>Aparima Forks wetland</u>  <u>Aparima Huts wetland complex</u>  <u>Castle Downs Bog (Hamilton Burn),</u>  <u>Jacobs River Estuary</u>  <u>Thornbury Peatland</u>  <u>Wrights Bush Peatland</u></p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Big Lagoon</u> <u>Long White Lagoon</u></p> <p><b><u>Fiordland including Fiordland National Park and Te Wāhipounamu South West New Zealand World Heritage Area including:</u></b></p> <p>Note there are numerous lakes and river systems which are in natural state and are regionally significant wetlands</p> <p><u>Waiuna Lagoon, Big Bay</u> <u>Pyke Valley (including Lake Alabaster and Lake Wilmott)</u> <u>Lower Hollyford / Martins Bay wetlands</u> <u>Transit Valley wetlands</u> Sutherland Sound <u>Lake Hauroko Wetland</u> Back Valley Grebe Valley</p> <p><b><u>Stewart Island Rakiura</u></b> <u>Freshwater Valley to upper Ruggedy Flats</u> <u>Island Hill Flats</u> <u>Rakeahua Valley wetlands</u> <u>Table Hill</u> Toetoes Flats</p> <p><b><u>Waiau Catchment:</u></b> <u>Mavora Lakes (and associated wetlands</u> <u>Deer Flat wetland, Eglinton Valley</u> <u>Retford Stream wetland</u> <u>Bog Lake and Adjacent wetlands</u> <u>Lake Mistletoe</u> <u>Te Anau Downs wetland</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Pleasant Bay wetland</u> <u>Henry Creek wetland</u> Dunton Swamp Snowdon Forest wetland Takaro wetland <u>Dale bog pine wetland</u> <u>Dome Mire-Dismal swamp-Lake Te Aroha</u> <u>Eweburn Farm wetlands</u> <u>Lookout Hill wetland</u> <u>Sinclair Road</u> Dale Lake <u>and wetland</u> Dome Mire – Dismal Swamp <u>Big Bite / Swampy Bite (Glen Echo Station)</u> <u>Lake Echo-Lady Burn-Dale Creek</u> <u>Mt Prospect Road wetlands</u> Kākāpō Swamp <u>Dawson City/Mt Prospect wetlands</u> <u>Lake Luxmore</u> <u>Waiau Terrace wetland</u> <u>Rainbow Reach oxbow lake wetland</u> <u>Ballon Loop, Waiau River</u> Amoeboid Swamp Kepler Mire <u>Home Creek Wildlife Management Reserve</u> <u>Freestone Hill wetland</u> <u>Lake Rakatu/Back Valley/Richters Rock wetland complex</u> Redcliffe Reserve <u>Rakatu Wetlands</u> <u>Waiau Valley/Borland Burn wetlands (two separate wetlands)</u> Borland Mire

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p> <u>Grebe Valley wetlands</u>  <u>Borland Saddle-Mt Burns</u>  Chocolate Swamp, Dean Forest  <u>Hindley Burn wetland, Lillburn Valley</u>  <u>Lillburn wetland</u>  <u>Wairaki Lagoon</u>  <u>Leitham Burn wetland</u>  <u>Wairaki River wetland</u>  <u>Sharp Ridge wetland</u>  <u>Feldwick wetlands</u>  <u>Blue Bottle Swamp,</u>  <u>Morley Stream wetland</u>  <u>Waiau Lagoon, Waiau River mouth</u>  <u>Lake George</u>  <u>Lake Thomas</u>  Lake Luxmore  Waiau River - Te Waewae Lagoon  <u>Lagoon Creek Wildlife Management Reserve</u> </p> <p> <u>Others wetlands for consideration in Waiau catchment:</u>  <u>Upper Mararoa (Boundary Hut) wetland</u>  <u>Old Man Swamp</u>  <u>Stony Creek wetland</u>  <u>Ramparts Scenic Reserve</u>  <u>Home Creek (Waiau Trust) wetland</u>  <u>Upper Lillburn Valley wetland</u> </p> <p> <b><u>Oreti Catchment:</u></b>  <u>Hidden Burn wetland (upper Oreti Valley)</u>  <u>Upper Oreti valley, including Ashton Flats</u> </p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Wash Creek wetland</u> <u>Weydon Burn</u> <u>Dunearn wetland</u> <u>Drummond Swamp</u> <u>Taramoa peatland</u> <u>Otakau Stream wetland</u> <u>Lake Murihiku</u> <u>Oreti Beach coastal turf/wetland</u> <u>Ferry Road /Oreti Beach lagoon</u> <u>Oreti Beach gravel ponds</u> <u>Lower Waihopai River rushland</u> <u>Lower Hogkinson Road peatland</u> <u>Hokonui south-east peatland</u> <u>Grove Bush peatland</u> <u>Makarewa peatland</u> <u>Taylor Road wetland</u> <u>Titipua Stream tussockland</u> <u>Pebbly Hills swamp</u> <u>Cross Road swamp</u> <u>College Stream swamp</u> <u>Southdowns swamp</u> <u>Downs Road North tussockland</u> <u>Brydone West tussockland</u> <u>Downs Road tussockland</u> <u>Spurhead swamp</u>  <u>Others wetlands for consideration in Oreti catchment</u> <u>West Dome Station wetland</u>  <b><u>Mataura Catchment:</u></b>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Five Mile swamp (wetland in ancient Lake Wakatipu lake outlet)</u>  <u>Nokomai Mount Tennyson stringbog system (Dome Burn and Roaring Lion Creeks)</u>  Garvie Mountain Lakes and associated wetlands:  Blue Lake wetland  Gow Lake wetland  Scott Lake wetland</p> <p><u>Glenaray Stn alpine wetlands (with Welshmans, Upper Waikaia West Branch and Upper Waikaia East Branch catchments)</u>  <u>Campbell's Creek wetlands</u>  <u>Pukerau Red tussock Scientific Reserve</u>  <u>Lake Vincent</u>  <u>Lake Brunton Otaru</u>  <u>Waipapa Beach dune slack wetlands</u>  <u>Lake Cook and wetland</u>  <u>Haldane estuary and adjacent wetlands</u>  <u>The Reservoir</u></p> <p>Others wetlands for consideration in Mataura catchment:  ES Mataura Flood Plain wetland</p> <p><b><u>Waikawa Catchment</u></b>  <u>Waikawa Estuary and adjoining wetlands</u></p> <p><b><u>Waimatuku Catchment</u></b>  <u>Big and Little Bayswater Bog</u>  Drummond Peat Swamp (Isla Bank)  <u>Waimatuku Peatland</u>  <u>Big Lagoon</u>  <u>Long White Lagoon</u>  <u>Waimatuku Estuary</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>So Big Lagoon</u>
437.24	KEMPTHORNE Robert	Appendix A	Oppose in part	Acknowledgement of the special modified status of the Waiau.
752.176	Southland Fish & Game Council	Appendix A	Support Amend	<p>Amend Appendix A to include:</p> <p><b>Appendix 1</b>  <b>Regionally significant wetlands for inclusion in Appendix A – Regionally Significant Wetlands in Southland</b></p> <p>Include the following definition in Appendix A and the Glossary of the pWLP:</p> <p><u>“<b>Regionally significant wetlands</b> means wetlands identified in Appendix A (Regionally Significant Wetlands in Southland) <b>and</b> any natural wetland with indigenous vegetation cover.”</u></p> <p><b>Named regionally significant wetlands</b></p> <p><b><u>Awarua Plain - Southland Estuaries including:</u></b></p> <p><u>Waituna Scientific Reserve</u></p> <p><u>Seaward Moss Muddy Creek and adjacent wetlands</u></p> <p><u>Wetlands adjoining Awarua Bay</u></p> <p><u>Wetlands adjoining Bluff Harbour</u></p> <p><u>Wetlands adjoining New River Estuary</u></p> <p><u>Wetlands adjoining Fortrose Harbour (including lower Maitara <u>and</u> Titiroa River catchments wetlands)</u></p> <p><u>Toetoes wetland complex</u></p> <p><b><u>Aparima catchment:</u></b></p> <p><u>Mt Hamilton Station wetlands</u></p> <p><u>Hamilton Burn Flats wetland</u></p> <p><u>Centre Burn wetland So Big wetland complex (including Chewings Road bog and Moss Burn wetland)</u></p> <p><u>Braxton Bog</u></p> <p><u>Waterloo Burn wetland</u></p> <p><u>Aparima Forks wetland</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Aparima Huts wetland complex</u>  <u>Castle Downs Bog (Hamilton Burn)</u>,  <u>Jacobs River Estuary</u>  <u>Thornbury Peatland</u>  <u>Wrights Bush Peatland</u>  <u>Big Lagoon</u>  <u>Long White Lagoon</u></p> <p><b><u>Fiordland including Fiordland National Park and Te Wāhipounamu South West New Zealand World Heritage Area including:</u></b></p> <p>Note there are numerous lakes and river systems which are in natural state and are regionally significant wetlands</p> <p><u>Waiuna Lagoon, Big Bay</u>  <u>Pyke Valley (including Lake Alabaster and Lake Wilmott)</u>  <u>Lower Hollyford / Martins Bay wetlands</u>  <u>Transit Valley wetlands</u>  Sutherland Sound  <u>Lake Hauroko Wetland</u>  Back Valley  Grebe Valley</p> <p><b><u>Stewart Island Rakiura</u></b></p> <p><u>Freshwater Valley to upper Ruggedy Flats</u>  <u>Island Hill Flats</u>  <u>Rakeahua Valley wetlands</u>  <u>Table Hill</u>  Toetoes Flats</p> <p><b><u>Waiau Catchment:</u></b></p> <u>Mavora Lakes (and associated wetlands)</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Deer Flat wetland, Eglinton Valley</u> <u>Retford Stream wetland</u> <u>Bog Lake and Adjacent wetlands</u> <u>Lake Mistletoe</u> <u>Te Anau Downs wetland</u> <u>Pleasant Bay wetland</u> <u>Henry Creek wetland</u> Dunton Swamp Snowdon Forest wetland Takaro wetland <u>Dale bog pine wetland</u> <u>Dome Mire-Dismal swamp-Lake Te Aroha</u> <u>Eweburn Farm wetlands</u> <u>Lookout Hill wetland</u> <u>Sinclair Road</u> Dale Lake <u>and wetland</u> Dome Mire – Dismal Swamp <u>Big Bite / Swampy Bite (Glen Echo Station)</u> <u>Lake Echo-Lady Burn-Dale Creek</u> <u>Mt Prospect Road wetlands</u> Kākāpō Swamp <u>Dawson City/Mt Prospect wetlands</u> <u>Lake Luxmore</u> <u>Waiau Terrace wetland</u> <u>Rainbow Reach oxbow lake wetland</u> <u>Ballon Loop, Waiau River</u> Amoeboid Swamp Kepler Mire <u>Home Creek Wildlife Management Reserve</u> <u>Freestone Hill wetland</u>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>Lake Rakatu/Back Valley/Richters Rock wetland complex</u>  Redcliffe Reserve  <u>Rakatu Wetlands</u>  <u>Waiau Valley/Borland Burn wetlands (two separate wetlands)</u>  Borland Mire  <u>Grebe Valley wetlands</u>  <u>Borland Saddle-Mt Burns</u>  <u>Chocolate Swamp, Dean Forest</u>  <u>Hindley Burn wetland, Lillburn Valley</u>  <u>Lillburn wetland</u>  <u>Wairaki Lagoon</u>  <u>Wairaki River wetland</u>  <u>Sharp Ridge wetland</u>  <u>Feldwick wetlands</u>  <u>Blue Bottle Swamp,</u>  <u>Morley Stream wetland</u>  <u>Waiau Lagoon, Waiau River mouth</u>  <u>Lake George</u>  <u>Lake Thomas</u>  Lake Luxmore  Waiau River - Te Waewae Lagoon  <u>Lagoon Creek Wildlife Management Reserve</u></p> <p>Others wetlands for consideration in Waiau catchment:  <u>Upper Mararoa (Boundary Hut) wetland</u>  <u>Old Man Swamp</u>  <u>Stony Creek wetland</u>  <u>Ramparts Scenic Reserve</u>  <u>Home Creek (Waiau Trust) wetland</u>  <u>Upper Lillburn Valley wetland</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><b><u>Oreti Catchment:</u></b>  <u>Hidden Burn wetland (upper Oreti Valley)</u>  <u>Upper Oreti valley, including Ashton Flats</u>  <u>Wash Creek wetland</u>  <u>Weydon Burn</u>  <u>Dunearn wetland</u>  <u>Drummond Swamp</u>  <u>Taramoa peatland</u>  <u>Otakau Stream wetland</u>  <u>Lake Murihiku</u>  <u>Oreti Beach coastal turf/wetland</u>  <u>Ferry Road /Oreti Beach lagoon</u>  <u>Oreti Beach gravel ponds</u>  <u>Lower Waihopai River rushland</u>  <u>Lower Hogkinson Road peatland</u>  <u>Hokonui south-east peatland</u>  <u>Grove Bush peatland</u>  <u>Makarewa peatland</u>  <u>Taylor Road wetland</u>  <u>Titipua Stream tussockland</u>  <u>Pebbly Hills swamp</u>  <u>Cross Road swamp</u>  <u>College Stream swamp</u>  <u>Southdowns swamp</u>  <u>Downs Road North tussockland</u>  <u>Brydone West tussockland</u>  <u>Downs Road tussockland</u>  <u>Spurhead swamp</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Others wetlands for consideration in Oreti catchment  <u>West Dome Station wetland</u></p> <p><b><u>Mataura Catchment:</u></b>  <u>Five Mile swamp (wetland in ancient Lake Wakatipu lake outlet)</u>  <u>Nokomai Mount Tennyson stringbog system (Dome Burn and Roaring Lion Creeks)</u>  Garvie Mountain Lakes and associated wetlands:  Blue Lake wetland  Gow Lake wetland  Scott Lake wetland</p> <p><u>Glenaray Stn alpine wetlands (with Welshmans, Upper Waikaia West Branch and Upper Waikaia East Branch catchments)</u>  <u>Campbell's Creek wetlands</u>  <u>Pukerau Red tussock Scientific Reserve</u>  <u>Lake Vincent</u>  <u>Lake Brunton Otara</u>  <u>Waipapa Beach dune slack wetlands</u>  <u>Lake Cook and wetland</u>  <u>Haldane estuary and adjacent wetlands</u>  <u>The Reservoir</u></p> <p>Others wetlands for consideration in Mataura catchment:  <u>ES Mataura Flood Plain wetland</u></p> <p><b><u>Waikawa Catchment</u></b>  <u>Waikawa Estuary and adjoining wetlands</u></p> <p><b><u>Waimatuku Catchment</u></b>  <u>Big and Little Bayswater Bog</u>  Drummond Peat Swamp (Isla Bank)</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>Waimatuku Peatland</u> <u>Big Lagoon</u> <u>Long White Lagoon</u> <u>Waimatuku Estuary</u> <u>So Big Lagoon</u>
797.53	Te Runanga o Ngai Tahu	Appendix A	Support	Retain.
871.6	WILLANS Murray & Tarn	Appendix A	Amend	More accurately identify the location of the significant wetland on Lagoon Creek.

## Appendix B

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.113	Forest & Bird NZ	Appendix B	Support	Retain.
420.5	JACK Wallace	Appendix B	Support	Retain.
752.177	Southland Fish & Game Council	Appendix B	Support	Retain.
797.54	Te Runanga o Ngai Tahu	Appendix B	Support	Retain.

## Appendix C

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.114	Forest & Bird NZ	Appendix C	Support	Retain.
390.36	Horticulture NZ	Appendix C	Oppose	Delete Appendix C and reference to it in the Plan. Include specific sediment guidelines in the FMU sections of the Plan that reflect local

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				circumstances and conditions.
752.178	Southland Fish & Game Council	Appendix C	Support	Retain.

#### Appendix D

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
189.46	Dairy Holdings Ltd	Appendix D		Delete.
279.115	Forest & Bird NZ	Appendix D	Support	Retain.
390.37	Horticulture NZ	Appendix D	Support in part	Amend the Introduction by numbering the bullet point lists as A and B and require that these practices are complied with as a permitted activity best management practices. AND Label list A: Discharging agrichemicals over or into water AND Bullet point 4 should also include water taken for irrigation. AND Amend bullet point 12: dilute spray solutions to concentrations of active ingredient as determined by ACVM and HSNO.
752.179	Southland Fish & Game Council	Appendix D	Support	Retain.

#### Appendix E

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.45	Alliance Group Ltd	Appendix E	Oppose in part	Include provision for an exemption for adherence to the water quality standards for Alliance's Lorneville treated wastewater discharge to the Makarewa River. As an alternative relief, ensure the limits set out in Appendix E have been appropriately developed taking into account natural variability, community values and uses of each water body and consideration of other relevant water quality guidelines and standards (refer to the submission on Rule 5 and Appendix E).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Ensure that the water quality standards set out in Appendix E have been appropriately developed taking into account natural variability, community values and uses, and other relevant water quality guidelines</p> <p>Amend the standards to ensure they take appropriate account of existing and natural variability to ensure the limits are not unduly onerous. Undertake a review to ensure the standards have been developed undertaking a robust analysis of each water body and are appropriate in each circumstance, and make amendments to the limits if required as a result of this review process. For example, Alliance submits that an appropriate limit for water clarity for lowland rivers is a no greater than 33% change compared with upstream.</p> <p>Provide further clarification around the implications of the introduction of FMU provisions for provisions that are operative in the Plan at the time. Clarify whether the limits in Appendix E are therefore interim or temporary catchment limits, or whether they will remain for assessment against all point source discharge consents.</p>
189.47	Dairy Holdings Ltd	Appendix E		<p>Amend paragraph 2 of Appendix E, page 155: The standard for a given parameter will not apply in a surface waterbody where, due to natural causes, <u>or as the unavoidable result of an established land-use that cannot be reversed</u>, that parameter falls outside the range given in the standard.</p>
190.21	DairyNZ	Appendix E	Support Amend	<p>Clarify that the intent of Appendix E and if diffuse discharges are cumulatively meant to comply with Appendix E standards.</p> <p>and</p> <p>Amend to clarify reasonable mixing zone and monitoring approach. Where relevant, ensure consistency with the RMA.</p> <p>and</p> <p>Amend to bring this Standard in line with NOF and ensure it is only chlorophyll a and do not differentiate between growth types for applicable river types.</p> <p>and</p> <p>Amend to clarify that this Standard is only applicable during the bathing season and when there has been no rain for the preceding three days.</p> <p>and</p> <p>Amend to clarify that constructed wetlands or similar treatment systems including wet areas that are retired and restored to wetlands are excluded from the Standards. The Standards</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>should apply to point source discharges from these treatment systems after reasonable mixing.</p> <p>and</p> <p>Change the oxygen Standards to be consistent with the NOF and define that they are only applicable downstream of point source discharges.</p> <p>and</p> <p>Amend so that the clarity Standards reflect the TLI for the same system.</p> <p>And</p> <p>Ensure secchi depth standards acknowledge variability due to natural staining and tannins. Also ensure that secchi depths are appropriate for the equivalent TLI scores based on the desired chlorophyll a standards.</p>
265.107	Federated Farmers of NZ (Southland Province)	Appendix E	Oppose	<p>Ensure that Council ensures the Management Plan contains only the essential information to reduce nutrient losses, and that farmers can draft it themselves; that the Management Plans are held by farmers for the purpose of improving on farm practices; not held by Council.</p> <p>Amend the Water Quality Standards in line with NPS-FM standards. And Clarify within the Proposed Plan that FMUs can have different standards to those contained within Appendix E. Indicate that FMUs will establish further standards in line with catchment specific Objectives.</p>
277.57	Fonterra Co-operative Group Ltd	Appendix E	Oppose in part	<p>Amend the clarity criteria for “Mataura 3” as follows:  <u>“The natural colour and clarity of the waters must not be changed to a conspicuous extent, with clarity changes being indicated by the black disc clarity not being reduced below 80% of the value upstream of the discharge;”</u></p>
279.116	Forest & Bird NZ	Appendix E	Support with amendment	<p>Amend the water quality standards in Appendix E to improve the numerical and narrative parameters to provide for the life supporting capacity, ecosystem health and processes and swimability of freshwater. Add further parameters including deposited sediment, nutrients (nitrogen and phosphorus), cyanobacteria, the weighted composite cover (WCC) of filamentous and mat material (PeriWCC), periphyton, flow requirements, and toxicants.</p>
355.15	HARRIS David	Appendix E – Water Quality Standards	Amend	<p>Put additional water quality standards relating to nitrogen and dissolved phosphorus levels in Appendix E</p>
562.26	Meridian Energy Ltd	Appendix E		<p>Retain the second paragraph of Appendix E to read:  “the standard for a given parameter will not apply to an a surface water body where, due to natural causes, that parameter falls outside of the range given in the standard.”</p> <p>Amend Appendix E to read:</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ol style="list-style-type: none"> <li>1. Amend the first paragraph to read “these standards apply following reasonable mixing with the receiving waters, unless otherwise stated. They do not apply to waters within artificial storage ponds such as effluent storage ponds or stock water reservoirs or to temporarily ponder rainfall. <u>These standards exclude the Waiau Catchment to the extent that the achievement of the standards in these water bodies is affected by the effects of the existing hydroelectricity infrastructure on flows</u> and the introduction of nuisance periphyton into the catchment</li> <li>2. Amend the clause Surface water bodies classified as “Natural State Waters” to read “the natural quality of the water shall not be permanently altered, <u>following reasonable mixing with the receiving waters</u>”</li> </ol>
661.42	Ravensdown Ltd	Appendix E	Support	Ravensdown seeks an amendment of the water quality attributes addressed in Appendix E to be applied at the Freshwater Management Unit or sub-catchment level.
749.78	Southland Conservation Board	Appendix E	Amend	Clarify what is meant by ‘Natural State Waters’.
752.180	Southland Fish & Game Council	Appendix E	Support Amend	<p>Amend the water quality standards in Appendix E to include further objectives and numerical and narrative parameters to provide for the life supporting capacity, ecosystem health and processes, recreational, amenity and aesthetic values, mahinga kai, Maori, and natural character freshwater objectives and values.</p> <p>Parameters that should be included in addition to those set out are: deposited sediment, nutrients (nitrogen and phosphorus), cyanobacteria, the weighted composite cover (WCC) of filamentous and mat material (PeriWCC), periphyton, flow requirements, toxicants, and a narrative and numerical requirement for natural character.</p> <p>Amend as follows to include whichever is the highest of the following values:</p> <ol style="list-style-type: none"> <li>1 Where 2010 monitoring data exists for the waterbody numerical concentrations that reflect the 10% improvement by 2020 objective for specific parameters should be calculated; or</li> <li>2 As a minimum, Appendix E should include the standards set out in the NOF, including national bottom lines. Where standards are not available in the NOF, such as for dissolved reactive phosphorus, the applicable standard in the the Australian and New Zealand</li> </ol>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Guidelines for Fresh and Marine Water Quality (ANZECC 2000 Guidelines) should be referred to.
877.73	WILSON Aaron	Appendix E		Clarity on this appendix in regard to whether these standards align with or exceed the NSFW.
880.78	WILSON Shannon	Appendix E	Seek clarity	I seek clarity on this appendix in the regards to whether these standards align with or exceed the NSFW.

## Appendix F

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.117	Forest & Bird NZ	Appendix F	Support	Retain.
337.20	Growplan Ltd	Appendix F		Retain Maitauro.
752.181	Southland Fish & Game Council	Appendix F	Support	Retain.
797.55	Te Runanga o Ngai Tahu	Appendix F	Support	Retain.

## Appendix G

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
329.1	Gore District Council (Keith Hovell)	Appendix G	Amend	Amend Appendix G to identify that the popular bathing site in the Maitauro River in Gore is at the Woolwich Street Reserve, between the two blue lines shown on the image below [aerial photo attached to appendix].
381.28	HOLDER Wendy & Tom	Appendix G		Amend to include Braxholme Rail Bridge.
752.182	Southland Fish & Game Council	Appendix G	Support Amend	Retain Appendix G with the following amendment: Include “ <u>Maitauro River at Maitauro Bridge</u> ” in the list of popular bathing sites.
797.56	Te Runanga o Ngai Tahu	Appendix G	Support	Retain.

## Appendix H

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.118	Forest & Bird NZ	Appendix H	Support	Retain.
752.183	Southland Fish & Game Council	Appendix H	Support	Retain.

### Appendix I

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.110	BYTHELL Jesse	Appendix I	Oppose	Regarding Appendix I – Natural state waters outside national parks. I seek the inclusion of the following waters: <ul style="list-style-type: none"> <li>• Seaward Moss Conservation Area</li> <li>• Toetoes Conservation Area</li> <li>• Mokoreta Forest Conservation Area</li> <li>• Waikaia Forest Conservation Area</li> </ul>
279.119	Forest & Bird NZ	Appendix I	Support	Retain.
752.184	Southland Fish & Game Council	Appendix I	Support	Retain.
797.57	Te Runanga o Ngai Tahu	Appendix I	Support	Retain.

### Appendix J

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
17.46	Alliance Group Ltd	Appendix J	Oppose in part	Retain reference to Alliance's water takes from the Oreti and Makarewa Rivers, but also include its takes from the Makarewa and Mataura River for its other plants and potable water requirements.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought																																																																								
247.27	Environment Southland	Appendix J	Amend	<p>Replace the table on page 179 with the following:</p> <table border="1"> <thead> <tr> <th>Operator</th> <th>Catchment</th> <th>Groundwater Zone</th> <th>Source</th> <th>Northing</th> <th>Easting</th> </tr> </thead> <tbody> <tr> <td>Alliance Group Ltd</td> <td>Oreti River</td> <td></td> <td>River</td> <td><u>1236114</u></td> <td><u>4858300</u></td> </tr> <tr> <td>Alliance Group Ltd</td> <td>Makarewa River</td> <td></td> <td>River</td> <td><u>1238519</u></td> <td><u>4857204</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td>Knapdale</td> <td>River/Bore</td> <td><u>1285995</u></td> <td><u>4890305</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td>Knapdale</td> <td>River/Bore</td> <td><u>1285928</u></td> <td><u>4890434</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td>Knapdale</td> <td>River/Bore</td> <td><u>1286408</u></td> <td><u>4888536</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td>Knapdale</td> <td>River/Bore</td> <td><u>1286408</u></td> <td><u>4888436</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td></td> <td>River</td> <td><u>1286553</u></td> <td><u>4888712</u></td> </tr> <tr> <td>Gore District Council</td> <td>Mataura River</td> <td></td> <td>River</td> <td><u>1285399</u></td> <td><u>4890083</u></td> </tr> <tr> <td>Invercargill City Council</td> <td>Oreti River</td> <td></td> <td>River</td> <td><u>1237097</u></td> <td><u>4862497</u></td> </tr> <tr> <td>Southland District Council</td> <td></td> <td>Lintley Aquifer</td> <td>Bore</td> <td><u>1244564</u></td> <td><u>4925736</u></td> </tr> <tr> <td>Gore District</td> <td>Waikana</td> <td></td> <td>River</td> <td><u>1282755</u></td> <td><u>4875915</u></td> </tr> </tbody> </table>	Operator	Catchment	Groundwater Zone	Source	Northing	Easting	Alliance Group Ltd	Oreti River		River	<u>1236114</u>	<u>4858300</u>	Alliance Group Ltd	Makarewa River		River	<u>1238519</u>	<u>4857204</u>	Gore District Council	Mataura River	Knapdale	River/Bore	<u>1285995</u>	<u>4890305</u>	Gore District Council	Mataura River	Knapdale	River/Bore	<u>1285928</u>	<u>4890434</u>	Gore District Council	Mataura River	Knapdale	River/Bore	<u>1286408</u>	<u>4888536</u>	Gore District Council	Mataura River	Knapdale	River/Bore	<u>1286408</u>	<u>4888436</u>	Gore District Council	Mataura River		River	<u>1286553</u>	<u>4888712</u>	Gore District Council	Mataura River		River	<u>1285399</u>	<u>4890083</u>	Invercargill City Council	Oreti River		River	<u>1237097</u>	<u>4862497</u>	Southland District Council		Lintley Aquifer	Bore	<u>1244564</u>	<u>4925736</u>	Gore District	Waikana		River	<u>1282755</u>	<u>4875915</u>
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought								
				Council	Stream							
				Gore District Council	Pluera Stream		River	<u>1286578</u>	<u>4875590</u>			>501
				Gore District Council	Mataura River		River	<u>1282177</u>	<u>4877303</u>			>501
				NZAS		Tiwai	Bore	<u>1249296</u>	<u>4829996</u>			>501
				NZAS		Tiwai	Bore	<u>1251688</u>	<u>4829407</u>			>501
				NZAS		Tiwai	Bore	<u>1250182</u>	<u>4829324</u>			>501
				NZAS		Tiwai	Bore	<u>1250919</u>	<u>4829631</u>			>501
				NZAS		Tiwai	Bore	<u>1252451</u>	<u>4829364</u>			>501
				NZAS		Tiwai	Bore	<u>1253998</u>	<u>4829272</u>			>501
				Southland District Council	Morley Creek		River	<u>1210668</u>	<u>4902284</u>			>501
				Southland District Council	Aparima River	Lower Aparima	River/Bore	<u>1213438</u>	<u>4878962</u>			>501
				Southland District Council	Aparima River	Lower Aparima	River/Bore	<u>1217611</u>	<u>4859627</u>			>501
				<u>Southland District Council</u>	-	<u>Lower Aparima</u>	<u>Bore</u>	<u>1215783</u>	<u>4859557</u>			<u>&gt;501</u>
				Southland	Upukerora	Te Anau	River/Bore	<u>1188566</u>	<u>4957972</u>			>501

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought								
				District Council	River		e					
				Southland District Council	Lake Anau	Te	Te Anau	Lake/Bore	<u>1185870</u>	<u>4958439</u>	>501	
				Southland District Council	Lake Anau	Te	Te Anau	Lake/Bore	<u>1185840</u>	<u>4958399</u>	>501	
				Southland District Council	Lake Anau	Te	Te Anau	Lake/Bore	<u>1185766</u>	<u>4958246</u>	>501	
				Southland District Council			Lower Waiau	Bore	<u>1189060</u>	<u>4878081</u>	>501	
				Southland District Council			Lower Waiau	Bore	<u>1189273</u>	<u>4877842</u>	>501	
				Southland District Council			Lower Oreti	Bore	<u>1237485</u>	<u>4880559</u>	>501	
				Southland District Council			Lower Oreti	Bore	<u>1237669</u>	<u>4880633</u>	>501	
				Southland District Council	Bowen River			River	<u>1198112</u>	<u>5041740</u>	>501	

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
277.58	Fonterra Co-operative Group Ltd	Appendix J	Support Amend	<p>Include the Fonterra Edendale water supply bores in Appendix J, namely:</p> <ul style="list-style-type: none"> <li>• F46/0246;</li> <li>• F46/0343;</li> <li>• F46/0344;</li> <li>• F46/0505;</li> <li>• F46/0764;</li> </ul> <p>F46/0797.</p>
279.120	Forest & Bird NZ	Appendix J	Support	Retain.
752.185	Southland Fish & Game Council	Appendix J	Support	Retain.
797.58	Te Runanga o Ngai Tahu	Appendix J	Support	Retain.

## Appendix K

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
189.48	Dairy Holdings Ltd	Appendix K		<p>Clarify the use of median flow vs. natural mean flow in calculating minimum flows.</p> <p>Clarify Method 1 and use of the Table in Method 1.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought																																				
210.98	Director-General of Conservation	Appendix K	Support in part	<p>Amend Appendix K as follows:</p> <table border="1"> <thead> <tr> <th data-bbox="1032 268 1294 304"><u>Critical value</u></th> <th data-bbox="1308 268 1503 304"><u>Fishery quality</u></th> <th data-bbox="1585 268 1742 347"><u>Significance ranking</u></th> <th data-bbox="1861 268 2119 304"><u>% Habitat retention</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 368 1294 443">Large adult trout – perennial fishery</td> <td data-bbox="1308 368 1379 405">High</td> <td data-bbox="1585 368 1608 405">1</td> <td data-bbox="1861 368 1951 405"><del>90</del> 100</td> </tr> <tr> <td data-bbox="1032 469 1196 544">Diadromous galaxiid</td> <td data-bbox="1308 469 1379 505">High</td> <td data-bbox="1585 469 1608 505">1</td> <td data-bbox="1861 469 1951 505"><del>90</del> 100</td> </tr> <tr> <td data-bbox="1032 569 1256 644">Non-diadromous galaxiid</td> <td data-bbox="1308 569 1330 606">-</td> <td data-bbox="1585 569 1630 606">2 1</td> <td data-bbox="1861 569 1951 606"><del>80</del> 100</td> </tr> <tr> <td data-bbox="1032 670 1267 783">Trout spawning/juvenile rearing</td> <td data-bbox="1308 670 1379 707">High</td> <td data-bbox="1585 670 1608 707">3</td> <td data-bbox="1861 670 1899 707">70</td> </tr> <tr> <td data-bbox="1032 809 1294 884">Large adult trout – perennial fishery</td> <td data-bbox="1308 809 1379 845">Low</td> <td data-bbox="1585 809 1608 845">3</td> <td data-bbox="1861 809 1899 845">70</td> </tr> <tr> <td data-bbox="1032 909 1196 984">Diadromous galaxiid</td> <td data-bbox="1308 909 1379 946">Low</td> <td data-bbox="1585 909 1608 946">3</td> <td data-bbox="1861 909 1899 946">70</td> </tr> <tr> <td data-bbox="1032 1010 1267 1123">Trout spawning/juvenile rearing</td> <td data-bbox="1308 1010 1379 1046">Low</td> <td data-bbox="1585 1010 1608 1046">5</td> <td data-bbox="1861 1010 1899 1046">60</td> </tr> <tr> <td data-bbox="1032 1149 1290 1262">Redfin/common bully, and <u>Torrent fish</u></td> <td data-bbox="1308 1149 1330 1185">-</td> <td data-bbox="1585 1149 1630 1185">5 1</td> <td data-bbox="1861 1149 1951 1185"><del>60</del> 100</td> </tr> </tbody> </table>	<u>Critical value</u>	<u>Fishery quality</u>	<u>Significance ranking</u>	<u>% Habitat retention</u>	Large adult trout – perennial fishery	High	1	<del>90</del> 100	Diadromous galaxiid	High	1	<del>90</del> 100	Non-diadromous galaxiid	-	2 1	<del>80</del> 100	Trout spawning/juvenile rearing	High	3	70	Large adult trout – perennial fishery	Low	3	70	Diadromous galaxiid	Low	3	70	Trout spawning/juvenile rearing	Low	5	60	Redfin/common bully, and <u>Torrent fish</u>	-	5 1	<del>60</del> 100
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247.28	Environment Southland	Appendix K	Amend	Amend Appendix K as set out in Appendix 2 attached to this submission - revision to Appendix K.																																				

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>• <b>Appendix K – Surface Water Appendix</b></li> </ul> <p><b>Methodology for establishing the point used to determine minimum flow and the level of allocation</b></p> <p>The point used to determine the minimum flow and the level of allocation for the purposes of Policy 22 is as follows:</p> <ul style="list-style-type: none"> <li>(i) the point of take; or</li> <li>(ii) in the case of surface waterbodies where flow is lost to groundwater along the length of the surface waterbody, the most flow sensitive point downstream.</li> </ul> <p>The Southland Regional Council will determine the location of the above. Minimum flows are to be developed through gauging of river flows correlated with Southland Regional Council approved water level monitoring sites, rated flow recording sites, or hydrologic modelling.</p> <p><b><u>Minimum flows</u></b></p> <p>The minimum flow will be as follows:</p> <ul style="list-style-type: none"> <li>(i) for takes from the primary allocation, the minimum flow will be Q95;</li> <li>(ii) for takes from the secondary allocation, the minimum flow will be the <u>natural</u> median flow during the period from 1 April to 30 November each year and the natural mean flow during the period from 1 December to 31 March each year;</li> <li>(iii) for takes outside of the primary or secondary allocation, the minimum flow will be derived on a case-by-case basis using the guidance contained in <u>Method 2 of Appendix K</u>.</li> </ul> <p>In situations where surface water and groundwater interact, a minimum groundwater level may also be set to maintain instream values.</p> <p>In the absence of quality information, a precautionary approach will be adopted.</p> <p><b><u>Primary and secondary allocation</u></b></p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Primary allocation regimes will be determined by:</p> <ul style="list-style-type: none"> <li>(i) for all surface waterbodies outside the Waiau catchment and not subject to a Water Conservation Order that specifies an alternative environmental flow and level regime, a primary allocation is available when the following criteria can be met: <ul style="list-style-type: none"> <li>(1) the total surface water allocation does not exceed a volume of 30 percent of the natural pre-allocation Q95 at any downstream point in the catchment as determined by the Southland Regional Council following the methodology established in Appendix K; and</li> <li>(2) the flow at that location is at or above the natural Q95;</li> </ul> </li> <li>(ii) in the Waiau catchment, the primary allocation is that authorised through resource consents in force and operative with their terms;</li> <li>(iii) for surface waterbodies subject to a Water Conservation Order that specifies an environmental flow and level regime, the primary allocation will be that specified in the Order;</li> <li>(iv) in the absence of quality information, a precautionary approach will be adopted.</li> </ul> <p>Secondary allocation regimes will be determined by:</p> <ul style="list-style-type: none"> <li>(i) for all surface waterbodies outside the Waiau catchment and not subject to a Water Conservation Order that specifies an alternative environmental flow and level regime, a supplementary allocation is available when the following criteria can be met: <ul style="list-style-type: none"> <li>(1) the total surface water allocation does not exceed a volume of 10 percent of the relevant seasonal flow cut-off flow in the surface waterbody at the time of take; and</li> <li>(2) the flow at that location is at or above the <u>natural</u> median flow during the period from 1 April to 30 November each year and the natural mean flow during the period from 1 December to 31 March each year;</li> </ul> </li> <li>(ii) in the Waiau catchment and for surface waterbodies subject to a Water Conservation Order that specifies an environmental flow and level regime, the primary allocation encompasses any supplementary allocation;</li> <li>(iii) in the absence of quality information, a precautionary approach will be adopted.</li> </ul> <p><b><i>Minimum flows</i></b></p> <p>The minimum flow will be as follows:</p> <ul style="list-style-type: none"> <li>(i) for takes from the primary allocation the minimum flow will be Q95;</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>(ii) for takes from the secondary allocation the minimum flow will be the natural median flow during the period from 1 April to 30 November each year and the natural mean flow during the period from 1 December to 31 March each year;</del></p> <p><del>(iii) for takes outside of the primary or secondary allocation, the minimum flow will be derived on a case-by-case basis using the guidance contained within this Appendix.</del></p> <p><del>In situations where surface water and groundwater interact, a minimum groundwater level may also be set to maintain instream values.</del></p> <p><del>For all allocation regimes:</del></p> <p><del>Except for surface waterbodies subject to an environmental flow and level regime established under any Water Conservation Order, establish environmental flow and level regimes for surface waterbodies taking into account the following matters where appropriate:</del></p> <ul style="list-style-type: none"> <li><del>(i) mauri and healthy ecosystems of indigenous species, including mahinga kai species;</del></li> <li><del>(ii) wāhi tapu sites or areas, and wāhi taonga;</del></li> <li><del>(iii) natural character, landscape, and visual amenity;</del></li> <li><del>(iv) indigenous vegetation within and adjacent to the waterbody;</del></li> <li><del>(v) habitats including spawning and nesting areas for invertebrates, birds and fish;</del></li> <li><del>(vi) fish passage, including facilitating the passage of native and salmonid fish where appropriate, and limiting the introduction of undesirable species and the spread of non native species into areas where they are not normally found;</del></li> <li><del>(vii) undesirable periphyton and sediment accumulation;</del></li> <li><del>(viii) maintenance of groundwater flows;</del></li> <li><del>(ix) the potential for establishment of invading exotic vegetation;</del></li> <li><del>(x) bedload and sediment transport processes;</del></li> <li><del>(xi) shoreline or bank erosion;</del></li> <li><del>(xii) functioning of the river mouth;</del></li> <li><del>(xiii) recreation opportunities;</del></li> <li><del>(xiv) accessibility to waterbodies and their margins;</del></li> <li><del>(xv) existing flow and level regimes, physical resources and activities;</del></li> <li><del>(xvi) the positive effects resulting from the use and development of the water resources; and</del></li> </ul> <p><b>Assessments of environmental effects for surface water takes, diversion and use</b></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought											
				<p>(i) In situations where the total volume of surface water allocation is between 10 and 30 percent of the <u>naturalised</u> Q95 at any downstream point in the catchment as determined by the Southland Regional Council following the methodology established above, an assessment of environment effects using Method 1 below will be required.</p> <p>(ii) In situations where the total volume of surface water allocation will breach 30 percent of the <u>naturalised</u> Q95 at any downstream point in the catchment as determined by the Southland Regional Council following the methodology established above, an assessment of environment effects using Method 2 below will be required.</p> <p><b><i>Method 1 – Assessment using Generalised Habitat Models</i></b></p> <p>The process for undertaking an assessment of environmental effects using generalised habitat models is as follows:</p> <ul style="list-style-type: none"> <li>• <b>Step 1:</b> Determine the relevant surface water management unit and flow range using Environment Southland flow data.</li> <li>• <b>Step 2:</b> Determine the appropriate critical value from the data obtained in Step 1 using following table which shows critical values by surface water management unit and flow range:</li> </ul> <table border="1" data-bbox="1117 855 2134 1414"> <thead> <tr> <th data-bbox="1117 855 1364 954" rowspan="2">Median flow</th> <th colspan="3" data-bbox="1364 855 2134 954">Surface Water Management Unit</th> </tr> <tr> <th data-bbox="1364 954 1588 1099">Lowland</th> <th data-bbox="1588 954 1812 1099">Hill/Mountain</th> <th data-bbox="1812 954 2134 1099">Hill2 (Hokonui/Catlins)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1117 1099 1364 1414">0 – 300 L/s</td> <td data-bbox="1364 1099 1588 1414">Diadromous galaxiid</td> <td data-bbox="1588 1099 1812 1414">Non-diadromous galaxiid</td> <td data-bbox="1812 1099 2134 1414">Diadromous galaxiids (low elevation) and non-diadromous galaxiids at higher elevations</td> </tr> </tbody> </table>	Median flow	Surface Water Management Unit			Lowland	Hill/Mountain	Hill2 (Hokonui/Catlins)	0 – 300 L/s	Diadromous galaxiid	Non-diadromous galaxiid	Diadromous galaxiids (low elevation) and non-diadromous galaxiids at higher elevations
Median flow	Surface Water Management Unit														
	Lowland	Hill/Mountain	Hill2 (Hokonui/Catlins)												
0 – 300 L/s	Diadromous galaxiid	Non-diadromous galaxiid	Diadromous galaxiids (low elevation) and non-diadromous galaxiids at higher elevations												

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought			
				300 – 750 L/s	Redfin/comm on bully	Trout spawning/juvenile rearing or non-diadromous galaxiid if trout excluded	Trout spawning/juvenile rearing or non-diadromous galaxiid if trout excluded Large adult trout
				0.75 – 2.5 m <sup>3</sup> /s	Trout spawning/juvenile rearing*  Large adult trout	Trout spawning/juvenile rearing  Large adult trout	Trout spawning/juvenile rearing
				2.5 – 5 m <sup>3</sup> /s	Trout spawning/juvenile rearing*	Large adult trout	Large adult trout
				> 5 m <sup>3</sup> /s	Large adult trout	Large adult trout	Large adult trout
				<b>Step 3:</b> Determine the level of habitat at the <u>naturalised Q95</u> <del>mean annual low flow</del> using			

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought								
				<p>generalised habitat models for the critical value species (refer to <i>Review of methods for setting water quantity conditions in the Environment Southland draft Regional Water Plan, NIWA, June 2004</i>) and compare with the cumulative effect of the allocated and proposed water takes.</p> <p><b>Method 2 –Assessment using Instream Habitat Flow Incremental Methodology</b></p> <p>The process for undertaking an assessment of environmental effects using instream habitat analysis is the same as the process using generalised habitat models outlined in Steps 1 and 2 above. Steps 3 and 4 of this process are as follows:</p> <ul style="list-style-type: none"> <li>• <b>Step 3:</b> Determine the level of habitat <u>across the flow range at the Q95</u> using detailed instream habitat analysis for the critical value species (refer to <i>Review of methods for setting water quantity conditions in the Environment Southland draft Regional Water Plan, NIWA, June 2004</i>). For catchments with rivers with a median flow greater than 4.5 m<sup>3</sup>/s, Net Rate of Energy Intake modelling will be used to determine/revise allocation policy for that catchment.</li> <li>• <b>Step 4:</b> Determine the habitat maintenance level using the following table. The habitat maintenance level is based on retaining a percentage of the habitat <u>across the flow range and at Q95</u> or a proportion of the maximum habitat if it occurs at a flow less than the Q95. The flow that corresponds to this habitat maintenance level will be used to determine the impact of the cumulative abstraction on the water body and assist in determining if consent should be granted <u>and if so, the appropriate minimum flow</u>.</li> </ul> <p>Fishery quality will be assumed to be high unless agreed otherwise by key stakeholders such as the Department of Conservation, Fish and Game New Zealand and Te Ao Mārama. Similarly, the habitat <u>maintenance retention</u> level could be adjusted depending on the perceived values of the out-of-stream use in consultation with key stakeholders.</p> <table border="1" data-bbox="1117 1166 2128 1337"> <thead> <tr> <th data-bbox="1117 1166 1480 1337">Critical value</th> <th data-bbox="1480 1166 1675 1337">Fishery quality</th> <th data-bbox="1675 1166 1928 1337">Significance ranking</th> <th data-bbox="1928 1166 2128 1337">% Habitat retention</th> </tr> </thead> <tbody> <tr> <td data-bbox="1117 1337 1480 1433">Large adult trout –</td> <td data-bbox="1480 1337 1675 1433">High</td> <td data-bbox="1675 1337 1928 1433">1</td> <td data-bbox="1928 1337 2128 1433">90</td> </tr> </tbody> </table>	Critical value	Fishery quality	Significance ranking	% Habitat retention	Large adult trout –	High	1	90
Critical value	Fishery quality	Significance ranking	% Habitat retention									
Large adult trout –	High	1	90									

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought																												
				<p>perennial fishery</p> <table border="1"> <tr> <td>Diadromous galaxiid</td> <td>High</td> <td>1</td> <td>90</td> </tr> <tr> <td>Non-diadromous galaxiid</td> <td>-</td> <td>2</td> <td>80</td> </tr> <tr> <td>Trout spawning/juvenile rearing</td> <td>High</td> <td>3</td> <td>70</td> </tr> <tr> <td>Large adult trout – perennial fishery</td> <td>Low</td> <td>3</td> <td>70</td> </tr> <tr> <td>Diadromous galaxiid</td> <td>Low</td> <td>3</td> <td>70</td> </tr> <tr> <td>Trout spawning/juvenile rearing</td> <td>Low</td> <td>5</td> <td>60</td> </tr> <tr> <td>Redfin/common bully</td> <td>-</td> <td>5</td> <td>60</td> </tr> </table>	Diadromous galaxiid	High	1	90	Non-diadromous galaxiid	-	2	80	Trout spawning/juvenile rearing	High	3	70	Large adult trout – perennial fishery	Low	3	70	Diadromous galaxiid	Low	3	70	Trout spawning/juvenile rearing	Low	5	60	Redfin/common bully	-	5	60
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Redfin/common bully	-	5	60																													
279.121	Forest & Bird NZ	Appendix K	Support with amendment	Amend Appendix K to set Habitat retention value at 100% for all native fish.																												
414.12	Irrigation NZ Incorporated	Appendix K		Delete the ‘Assessment of environmental effects for surface water takes, diversion and use’ from Appendix K; or Provide the current stepped process but without the tables that contain the value judgements.																												
464.31	Landpro Ltd	Appendix K	Oppose in part	We seek a higher percentage and/or justification for such a low surface water allocation (10 %). We suggest this point is amended as follows: “in the case of surface waterbodies where flow is lost to groundwater along the length of the surface waterbody, <del>the most flow sensitive point downstream.</del> <u>the nearest downstream environment Southland monitoring point</u> ”. Also, there is a lack of clarity around the wording ‘any downstream point determined by the Southland Regional																												

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Council' throughout Appendix K. Clarity of the this is required.
752.186	Southland Fish & Game Council	Appendix K	Support Amend	<p>Amend the table for Method 1 for streams with a Median flow between 300 – 750 L/s in the Lowland Surface Water Management Unit to read “<u>Trout spawning/juvenile rearing or Redfin / common bully if trout excluded</u>”</p> <p>And</p> <p>Amend the table for Method 1 for streams with a Median flow between 300 – 750 L/s in the Hill/Mountain Surface Water Management Unit and 0.75 -2.5 m<sup>3</sup>/s in Hill2 Surface Water Management Unit to include “<u>Large adult trout</u>”.</p> <p>And</p> <p>Remove reference to Generalised Habitat Models and replace with <i>Instream Habitat Flow Incremental Methodology</i>.</p> <p>Replace the “<i>Review of methods for setting water quantity conditions in the Environment Southland draft Regional Water Plan, NIWA, June 2004</i>” with an updated review reflecting the most recent international research.</p> <p>And</p> <p>Replace the “<i>Review of methods for setting water quantity conditions in the Environment Southland draft Regional Water Plan, NIWA, June 2004</i>” with an updated review reflecting the most recent international research.</p> <p>And</p> <p>Amend Step 3: For catchments <del>with rivers with a median flow greater than 4.5 m<sup>3</sup>/s where large adult trout are identified as the critical value,</del> Net Rate of Energy Intake modelling will be used to determine/revise allocation policy for that catchment.</p> <p>And amend step 4:</p> <p>The habitat maintenance level is based on retaining a percentage of the habitat at Q95. <del>or a proportion of the maximum habitat if it occurs at a flow less than the Q95</del></p> <p>And</p> <p>Amend table on page 184 for all high quality fisheries to retain 100% of large adult trout habitat at Q95.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				% Habitat retention <del>90</del> <u>100</u>

## Appendix L

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
40.15	BAKER David	Appendix L	Oppose	That there are no water cut offs to the Garvie Aquifer until there is significant evidence to support the need for them.
40.16	BAKER David	Appendix L	Oppose	Appendix – L.5: That there are no water cut offs to the Garvie Aquifer until there is significant evidence to support the need for them
47.25	Balfour, Wendonside & Waikaia Group	Appendix L	Oppose	Removal of cut offs for Garvie Aquifer and questioning the existence of the Aquifer and its relation to other groundwater bodies.
47.26	Balfour, Wendonside & Waikaia Group	Appendix L.4	Support in part	Appendix L.4: Inclusion of a provision to apply stock drinking water volumes to surface water takes.  Appendix L.5: Return to Water Plan allocations.  Table Y6: We propose the PSWLP removes these cut offs altogether, until such time as the science can be provided to demonstrate that the aquifer even requires a cut off, and the appropriate cut off level it should be.
189.49	Dairy Holdings Ltd	Appendix L		Amend Appendix L.4 as follows: Where not specified by existing resource consent conditions, maximum daily and seasonal abstraction rates used for calculating cumulative allocation volumes under Rule 52, <u>and for calculating 'reasonable use' of water where relevant</u> , will be established on the following basis.
210.99	Director-General of Conservation	Appendix L	Oppose	Amend Table Y.2 Management Approach <del>No specific</del> Minimum flow restrictions will be imposed on the groundwater take
246.6	ENGLISH Hamish	Appendix L		Table Y 7: Amend cut off 201.5 msl to a range of 245-250 masl.
247.29	Environment Southland	Appendix L	Amend	Update all table names within Appendix L from Y to L. Change any subsection references that



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought						
				<p>begin Y to L also.</p> <p>Either delete Appendix L.1, or clarify its application, through Rules 16 and 54.</p> <p>Amend Appendix L.2 as follows:</p> <p><b>Appendix L.2 stream depletion effects</b></p> <p>in the Mataura River catchment, the relevant minimum flow cut-off for groundwater takes classified as having a riparian, direct or high hydraulic connection will be determined as the figure required to maintain compliance with the flow allocation provisions of the Water Conservation (Mataura River) Order 1997. In all other catchments minimum flow cut-offs for groundwater takes classified as having a riparian, direct or high hydraulic connection will be determined following the <u>methodology outlined in Appendix K – Policy 16 Environmental flow and level regimes</u>.</p> <p>Amend Table Y.2 as follows:</p> <table border="1" data-bbox="1021 751 2029 1430"> <tbody> <tr> <td data-bbox="1021 751 1229 1043">Direct</td> <td data-bbox="1229 751 1630 1043">Where the calculated effect on an adjacent surface waterbody after 7 days abstraction at the maximum authorised rate is greater than 80 percent of the assessed pumping rate</td> <td data-bbox="1630 751 2029 1043">The groundwater take will be managed as an equivalent surface water take for flow and allocation purposes and therefore subject to any relevant minimum flow <del>and flow sharing</del> regime</td> </tr> <tr> <td data-bbox="1021 1043 1229 1430">Moderate</td> <td data-bbox="1229 1043 1630 1430">Where the calculated effect on an adjacent surface waterbody after pumping at the maximum authorised rate for either: (i) the maximum period allowed by the seasonal volume; or (ii) a continuous period of 90 days</td> <td data-bbox="1630 1043 2029 1430">Where the magnitude exceeds 2 litres per second, the calculated stream depletion effect will be included in the allocation calculated from an adjacent surface waterbody <u>with the balance of the abstraction remainder of the allocation</u> included in the</td> </tr> </tbody> </table>	Direct	Where the calculated effect on an adjacent surface waterbody after 7 days abstraction at the maximum authorised rate is greater than 80 percent of the assessed pumping rate	The groundwater take will be managed as an equivalent surface water take for flow and allocation purposes and therefore subject to any relevant minimum flow <del>and flow sharing</del> regime	Moderate	Where the calculated effect on an adjacent surface waterbody after pumping at the maximum authorised rate for either: (i) the maximum period allowed by the seasonal volume; or (ii) a continuous period of 90 days	Where the magnitude exceeds 2 litres per second, the calculated stream depletion effect will be included in the allocation calculated from an adjacent surface waterbody <u>with the balance of the abstraction remainder of the allocation</u> included in the
Direct	Where the calculated effect on an adjacent surface waterbody after 7 days abstraction at the maximum authorised rate is greater than 80 percent of the assessed pumping rate	The groundwater take will be managed as an equivalent surface water take for flow and allocation purposes and therefore subject to any relevant minimum flow <del>and flow sharing</del> regime								
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought					
				<table border="1" data-bbox="1021 180 2031 400"> <tr> <td data-bbox="1021 180 1229 400"></td> <td data-bbox="1229 180 1630 400">is less between 30 and 60 percent of the assessed pumping rate or has a magnitude greater than 5 litres per second</td> <td data-bbox="1630 180 2031 400">allocation volume for the relevant groundwater zone. No specific minimum flow restrictions will be imposed on the groundwater take.</td> </tr> </table> <p data-bbox="1021 453 1397 480">Amend Appendix L.3 as follows:</p> <p data-bbox="1021 493 1379 520"><u>Determination of “Acceptable”</u></p> <p data-bbox="1021 528 2125 624">(iii) no more than 10 percent of the available drawdown in an unconfined aquifer which exists 50 percent of the time during natural conditions when no pumping is occurring <u>from the aquifer</u>, for bores utilised for long-term monitoring of water levels; or</p> <p data-bbox="1021 635 2125 730">(iv) no more than 20 percent of the available potentiometric head in a confined aquifer that exists 50 percent of the time during natural conditions when no pumping is occurring <u>from the aquifer</u>, for bores utilised for long-term monitoring of water levels.</p> <p data-bbox="1021 775 2125 839">(b) An increased volume or increased pumping rate for any lawfully established groundwater abstraction will be considered a new groundwater abstraction under <u>Policy 22</u><del>this policy</del>.</p> <p data-bbox="1021 874 2125 1002">(c) Adequacy of bore construction and the available drawdown will be calculated following the methodology outlined in Appendix L.3. <del>An increased volume or increased pumping rate for any lawfully established groundwater abstraction will be considered a new groundwater abstraction under this policy</del></p> <p data-bbox="1021 1054 1397 1082">Amend Appendix L.4 as follows:</p> <p data-bbox="1021 1098 2125 1193">Where not specified by existing resource consent conditions, maximum daily and seasonal abstraction rates used for calculating <u>total groundwater allocation</u> <del>cumulative allocation volumes</del> under Rule 54<del>2</del> will be established on the following basis...</p> <p data-bbox="1021 1246 1352 1273">Amend Table Y.4 as follows:</p> <table border="1" data-bbox="1037 1286 1637 1383"> <tr> <td data-bbox="1037 1286 1352 1383"><b>Groundwater Zone</b></td> <td data-bbox="1352 1286 1637 1383"><b>Primary Allocation (m<sup>3</sup> x 10<sup>6</sup>/year)</b></td> </tr> </table>		is less between 30 and 60 percent of the assessed pumping rate or has a magnitude greater than 5 litres per second	allocation volume for the relevant groundwater zone. No specific minimum flow restrictions will be imposed on the groundwater take.	<b>Groundwater Zone</b>	<b>Primary Allocation (m<sup>3</sup> x 10<sup>6</sup>/year)</b>
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<b>Groundwater Zone</b>	<b>Primary Allocation (m<sup>3</sup> x 10<sup>6</sup>/year)</b>								

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought	
				Awarua	<del>32.29</del> <u>45.81</u>
				Blackmount	<del>15.46</del> <u>21.12</u>
				Castlerock	<del>4.00</del> <u>6.12</u>
				Cattle Flat	<del>1.65</del> <u>2.39</u>
				Central Plains	<del>20.99</del> <u>31.29</u>
				Centre Hill	<del>5.29</del> <u>6.07</u>
				Croydon	<del>2.05</del> <u>2.56</u>
				Dipton	<del>6.32</del> <u>9.52</u>
				Edendale	<del>9.34</del> <u>11.71</u>
				Five Rivers	<del>12.23</del> <u>17.05</u>
				Knapdale	<del>2.22</del> <u>2.74</u>
				Longridge	<del>3.47</del> <u>4.67</u>
				Lower Aparima	<del>23.54</del> <u>32.41</u>
				Lower Matura	<del>24.97</del> <u>34.98</u>
				Lower Oreti	<del>13.49</del> <u>19.31</u>
				Makarewa	<del>44.65</del> <u>62.67</u>
				Orepuki	<del>8.00</del> <u>10.54</u>
				Oreti	<del>1.99</del> <u>2.73</u>
				Riversdale	<del>5.02</del> <u>6.53</u>
				Te Anau	<del>88.94</del> <u>118.25</u>
				Te Waewae	<del>13.83</del> <u>18.94</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought																							
				Tiwai	4.98 2.57																						
				Upper Aparima	41.06 56.93																						
				Upper Maitaha	27.84 10.40																						
				Waihopai	32.08 44.50																						
				Waimatuku	15.66 22.27																						
				Waimea Plains	9.30 12.41																						
				Waipounamu	1.16																						
				Wendon	3.83 5.22																						
				Wendonside	7.07 9.56																						
				Amend Table Y.5 as follows:																							
				<table border="1"> <thead> <tr> <th data-bbox="1039 847 1261 1086">Annual Allocation (m<sup>3</sup> x 10<sup>6</sup>/year)</th> <th data-bbox="1261 847 1496 1086">Monitoring bore</th> <th colspan="2" data-bbox="1496 847 1928 906">Initial level trigger</th> <th colspan="2" data-bbox="1928 847 2134 906">Minimum level</th> </tr> <tr> <td></td> <td></td> <th data-bbox="1496 906 1637 1086">m asl</th> <th data-bbox="1637 906 1928 1086">% reduction in <u>maximum</u> daily abstraction <u>rate</u> (m<sup>3</sup>/day)</th> <th data-bbox="1928 906 2056 1086">m asl</th> <th data-bbox="2056 906 2134 1086">% <u>maximum</u> abstraction (m<sup>3</sup>/c)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1039 1086 1261 1145">5.76</td> <td data-bbox="1261 1086 1496 1145">E44/0300</td> <td data-bbox="1496 1086 1637 1145">202.5</td> <td data-bbox="1637 1086 1928 1145">50</td> <td data-bbox="1928 1086 2056 1145">201.5</td> <td data-bbox="2056 1086 2134 1145">100</td> </tr> </tbody> </table>						Annual Allocation (m <sup>3</sup> x 10 <sup>6</sup> /year)	Monitoring bore	Initial level trigger		Minimum level				m asl	% reduction in <u>maximum</u> daily abstraction <u>rate</u> (m <sup>3</sup> /day)	m asl	% <u>maximum</u> abstraction (m <sup>3</sup> /c)	5.76	E44/0300	202.5	50	201.5	100
Annual Allocation (m <sup>3</sup> x 10 <sup>6</sup> /year)	Monitoring bore	Initial level trigger		Minimum level																							
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5.76	E44/0300	202.5	50	201.5	100																						
				Amend Table Y.7 as follows:																							
				<table border="1"> <thead> <tr> <th data-bbox="1039 1283 1261 1428">Annual Allocation (m<sup>3</sup> x 10<sup>6</sup>/year)</th> <th data-bbox="1261 1283 1496 1428">Monitoring bore</th> <th colspan="2" data-bbox="1496 1283 1839 1337">Minimum level cut-off</th> </tr> <tr> <td></td> <td></td> <th data-bbox="1496 1337 1624 1428">m asl</th> <th data-bbox="1624 1337 1839 1428">% reduction in <u>maximum</u></th> </tr> </thead> </table>						Annual Allocation (m <sup>3</sup> x 10 <sup>6</sup> /year)	Monitoring bore	Minimum level cut-off				m asl	% reduction in <u>maximum</u>										
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Sub ID & Sub Point	Submitter	Provision	Position	Decision sought																								
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258.28	Eyre Creek Ltd	Appendix L	Oppose	Table Y.5.2: Remove irrigation cut-offs in Garvie aquifer.																								
264.13	FarmRight Ltd	Appendix L	Oppose	Remove the allocation and the cutoffs tables Y.7 and Y.8 until the current process is complete.																								
265.108	Federated Farmers of NZ (Southland Province)	Appendix L	Oppose in part	Remove proposed changes to Appendix L and retain existing allocations.																								
277.59	Fonterra Co-operative Group Ltd	Appendix L.1	Oppose in part	<p>Amend the wording at the start of Appendix L.1 to read:  “Minimum aquifer test requirements to support resource consent applications to take groundwater, other than replacement consent applications for abstraction quantities that have been occurring with no adverse effects of a more than minor scale, are outlined in Table Y.1 below.”</p> <p>Amend Appendix L.2 by inserting an additional note at the end of Table Y.2:  “<u>The assessment of stream depletion effects shall take into account the offsetting component of any non-consumptive aspects of the take and use of water.</u>”</p>																								

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Amend Appendix L.3 by adding a new clause (a)(v) as follows:  <u>“(a)(v) In any situation where the drawdown interference exceeds any of the limits in sub-clauses (i) – (iv) the new groundwater abstraction will be considered acceptable if it can be demonstrated that the drawdown interference will not have an impact upon the yield of the bore that is any more than minor or the effect is mitigated.”</u></p> <p>Insert the following additional clause to Appendix L.3:  <u>“(e) The assessment of drawdown interference shall take into account the offsetting component of any non-consumptive aspects of the take and use of water.”</u></p>
279.122	Forest & Bird NZ	Appendix L	Oppose	<p>Amend Table Y2 Management Approach as follows:  <u>Direct</u>  Where the calculated effect on an adjacent surface waterbody after 7 days abstraction at the maximum authorised rate is <u>equal to or</u> greater than 80 percent of the assessed pumping rate.  <u>High</u>  Where the calculated effect on an adjacent surface waterbody<sup>a</sup> after pumping at the maximum authorised rate for either:  the maximum period allowed by the seasonal volume<sup>b</sup>, or  a continuous period of 90 days  is <u>equal to or</u> greater than 60 percent of the assessed pumping rate  <u>Moderate</u>  Where the magnitude exceeds 2 litres per second the calculated stream depletion effect will be included in the allocation calculated from an adjacent surface waterbody the remainder of the allocation included in the allocation volume for the relevant groundwater zone. <del>No specific minimum flow restrictions will be imposed on the groundwater take.</del> <u>Groundwater takes classified as having a moderate degree of hydraulic connection will be subject to any relevant minimum flow regime.</u></p>
337.21	Growplan Ltd	Appendix L		<p>L.2  There is too much reliance on models here, rather than real (or even just daily)-time monitoring of water levels (which is becoming simpler all the time), this regime could easily lead to a dry bed – at least in text so far read.  “Waterbodies characterised as ephemeral will be excluded from consideration of stream</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>depletion effects”;</p> <p>Ephemeral streams in many catchments represent a greater stream length than flowing waters. By not targeting ephemeral streams significant levels of target pollutants will be missed and flow on to pollute freshwater bodies and the ocean.</p> <p>“Stream depletion effects due to groundwater abstraction should not result in a more than minor effect on the frequency, extent and duration of flow loss in intermittent waterbodies”;</p> <p>Amend.</p> <p>Who decides on what ‘minor’ means? ‘minor’ needs a scientific definition. How is cumulative effect taken into account? How responsive will any controls be to climatic extremes? Will there be a way to control takes during climate events? Once a river is dead, they tend to be hard to bring back to life.</p>
381.29	HOLDER Wendy & Tom	Appendix L		Appendix L.4: Existing resource consents should be modified.
386.17	Hopcroft Farms Ltd	Appendix L	Oppose Support in part	<p>Remove the Garvie Aquifer from Appendix L.5 until there is sufficient certainty and appropriate documentation to warrant its inclusion. Remove the Garvie Aquifer from Y5.2 (as discussed earlier).</p> <p>Appears to be a typo on Table Y.7 as the North Range Aquifer has the same cut-off level as the Lumsden Aquifer, yet these aquifers are offset by &gt;10 metres.</p> <p>We oppose these values on the basis that no evidence is available and that it may cause some existing resource consents to be non-complying activities where the aquifer may not be over-allocated.</p> <p>Further justification of the changed water allocation volumes.</p>
393.2	HSV Dairy Ltd	Appendix L	Amend	Peak allocation of groundwater for dairy is 140 litres/head/day. Consider if this figure is relevant to 2016 and beyond.
424.7	JARVIS Ben	Appendix L	Oppose	No specific decision requested.
464.32	Landpro Ltd	Appendix L	Oppose	Remove the Garvie Aquifer from Appendix L.5 until there is sufficient certainty and appropriate documentation to warrant its inclusion.
464.33	Landpro Ltd	Appendix L.1	Oppose	<p>Delete Appendix L.1.</p> <p>Appendix L.2: We request that a note or schedule attached to the PSWLP which specifies how Environment Southland intended to implement the Maita Conservation Order in conjunction</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>with the Policies and Rules in the PSWLP. This would clarify matters for all parties and avoid unnecessary contesting through the consent process.</p> <p>Reference of Appendix L.4 in the PSWLP.</p> <p>Appendix L.5: Further justification of the changed water allocation volumes from those included in the RWPS.</p> <p>Appendix L.6: We seek that clarification for how confined or semi confined aquifers will be determined is provided in the PSWLP.</p>
487.6	M K H Farming Ltd	Appendix L	Amend	Amend policy by removing Garvie aquifer from plan.
569.15	MILLER R J Trust	Appendix L	Oppose	Removal of cut offs for Garvie aquifer and questioning the existence of the aquifer and its relation to other groundwater bodies.
569.16	MILLER R J Trust	Appendix L.5	Support in part	Further justification of the changed water allocation volumes from the RWPS to the pSWLP.
752.187	Southland Fish & Game Council	Appendix L	Oppose	<p>Amend the last bullet point on page 186 to provide:</p> <ul style="list-style-type: none"> <li>“in the Mataura River catchment, the relevant minimum flow cut-off for groundwater takes classified as having a riparian, direct, <del>or</del> high, <u>or moderate</u> hydraulic connection will be determined as the figure required to maintain compliance with the flow allocation provisions of the Water Conservation (Mataura River) Order 1997. In all other catchments minimum flow cut-offs for groundwater takes classified as having a riparian, direct, <del>or</del> high <u>or moderate</u> hydraulic connection will be determined following the Policy <del>46</del> <u>Environmental flow and level regimes</u> [insert correct policy reference – there is no Policy 16 – Environmental flow and level regimes in the pWLP].”</li> </ul> <p>Amend <i>Table Y.2: Classification and management of stream depletion effects</i> as set out in <b>Appendix 2</b> – of this submission [below]:</p> <p><b>Appendix 2 – Amendments sought to Table Y.2: Classification and management of stream depletion effects</b></p> <p><b>Table Y.2: Classification and management of stream depletion effects</b></p>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought		
				<b>Hydraulic Connection</b>	<b>Classification</b>	<b>Management Approach</b>
				Riparian	Any groundwater take within 5 metres of a surface waterbody <sup>a</sup>	The groundwater take will be managed as an equivalent surface water take unless there is hydrogeological evidence that demonstrates that pumping will have a significant impact on the surface waterbody.
				Direct	Where the calculated effect on an adjacent surface waterbody after 7 days abstraction at the maximum authorised rate is <u>equal to or greater than</u> 80 percent of the assessed pumping rate	The groundwater take will be managed as an equivalent surface water take for flow and allocation purposes and therefore subject to any relevant minimum flow sharing regime.
				High	Where the calculated effect on an adjacent surface waterbody <sup>a</sup> after 7 days abstraction at the maximum authorised rate is less than 80 percent of the assessed pumping rate; and, Where the calculated effect on an adjacent surface waterbody <sup>a</sup> after pumping at the maximum authorised rate for either: the maximum period allowed by the seasonal volume <sup>b</sup> , or a continuous period of 90 days is <u>equal to or greater than</u> 60 percent of the assessed pumping	Where the magnitude exceeds 100 litres per second the calculated stream depletion effect will be managed as an equivalent take from an adjacent surface waterbody. The remainder of the allocation will be included in the allocation available for the relevant groundwater. Groundwater takes classified as high degree of hydraulic connection will be subject to the relevant minimum flow regime.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought	
					<p>rate</p> <p>Moderate</p> <p>Where the calculated effect on an adjacent surface waterbody<sup>a</sup> after pumping at the maximum authorised rate for either: the maximum period allowed by the seasonal volume or a continuous period of 90 days is less between 30 and 60 percent of the assessed pumping rate or has a magnitude greater than 5 litres per second</p> <p>Where the magnitude exceeds 2 litres per second the calculated stream depletion effect will be included in the allocation calculated from an adjacent surface waterbody the remainder of the allocation included in the allocation volume for the relevant groundwater zone. <del>No specific minimum flow restrictions will be imposed on the groundwater take.</del> <u>Groundwater takes classified as having a moderate degree of hydraulic connection will be subject to any relevant minimum flow regime.</u></p> <p>Low</p> <p>Where the abstraction is not classified as having a riparian, high, direct or moderate hydraulic connection.</p> <p>The take will be managed solely as a groundwater take and the full allocation included in the allocation volume for the relevant groundwater management zone</p>
759.26	Springlands Group Ltd	Appendix L	Support in part	<p><b>Note-</b></p> <p><sup>a</sup> Includes rivers, streams, lakes and wetlands.</p> <p><sup>b</sup> In situations where the seasonal volume limits maximum rate abstraction to a period of less than 90 days.</p> <p>Appendix L.4: Inclusion of a provision to apply stock drinking water volumes to surface water takes.</p> <p>Appendix L.5: We propose the PSWLP removes the allocation and the cut offs tables Y.7 and Y.8 until the current process is complete.</p>	

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
868.34	Wilkins Farming Ltd	Appendix L	Oppose	Remove irrigation cut-offs in Garvie aquifer until sound environmental, economic and social due diligence has been obtained.
869.13	WILKINS Pam	Appendix L	Amend	Removal of cut offs for Garvie aquifer.

### Appendix M

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.123	Forest & Bird NZ	Appendix M	Support	Retain.
752.188	Southland Fish & Game Council	Appendix M	Support	Retain.
797.59	Te Runanga o Ngai Tahu	Appendix M	Support	Retain.

### Appendix N

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
2.1	A J Perkins Ltd	Appendix N	Support Amend	A review would be more realistic every 2-3 years. Our farming business does not want to do a plan and apply for multiple resource consents, such as fencing off creeks. We would prefer to do a farm plan thoroughly and have this signed off by Environment Southland. A lot of the information asked of is hard to get. It would be a very good idea if the farm plan is VERY simple to put together and review. This will make us much more successful in following through well with it.
5.16	ADAMS A J & P G	Appendix N	Amend	Plans should start 1 July at the earliest. Plans should be as simple as possible and should not result in a large cost to be compliant.
6.3	ADAMS Jules	Appendix N		Clarify the frequency with which a nutrient budget needs to be completed.
8.3	AFFLECK Christopher	Appendix N	Oppose	A management plan for intensive winter grazing should include: (i) a map indicating required setback distances; (ii) a list of sprays and fertilisers used and the amounts used.
14.7	ALLAN Frazer & Karen	Appendix N		Points of clarification:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>1 What is the definition of an intermittent stream, drain, pond or wetland. Is an intermittent pond an area in a paddock that results from heavy or prolonged rainfall and lasts for 2,3-5 days?</p> <p>2 Under Part B 3. Why do we need to show riparian vegetation and fences etc if it is also required in Part B 6.</p> <p>3 Who is to review the nutrient budget in Part B 4 (a) (iii)? If is developed by a trained fertiliser representative this should be good enough. Just another cost.</p> <p>4 Where are these "good management practices" and who will ensure that if this is the based used by ES that they are in fact practical, workable, and relevant to the industry they are targeted to. I have seen some pretty poor good management practices produced by people who have never set foot on a farm in their life.</p> <p>5 Part B (a) (iii) why do you need to know what we plant and how we are going to maintain it as long as we are doing it that should be enough.</p> <p>6 Part B (a) (v) why do you need this information if it is not for Southland Regional Council maintenance.</p> <p>7 Part B 8. (a) Where are the good management practices to be found for (i) and (ii).</p> <p>Part B 8. (b) (vi) What happens if you do not know where the sub-surface drains are in the paddock/s to be intensively grazed. As this will be a major undertaking I recommend that certain sections of this plan are required to be developed each year over the next three years.</p>
25.35	Ardel Dairies Ltd	Appendix N	Oppose	<p>Get industry to monitor on Farm Management Plan rather than ES managing this process.</p> <p>Exclude the use of Overseer.</p>
28.4	Aurum Farming Ltd	Appendix N	Oppose	<p>ES and Dairy companies should use same format for nutrient budgets to reduce duplication and confusion. Management plans will vary through the year with climate and economics. Should be compliant with rules.</p>
32.9	B D Farm Trust	Appendix N	Support Amend	<p>Amend – 4 nutrient budget required only if a significant change of farm system or fertiliser use is changed. Amend: Appendix N – needs to be simpler to complete for most as it stands. Amend to extend time frames.</p>
33.9	BACON V M	Appendix N	Support Aamend	<p>Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents. Make the farm plan simple.</p>
43.8	BAKER Shane & SHAW Wendy	Appendix N		<p>To prepare and execute a farm management plan 12 months in advance is unprofessional, foolish and a naïve way to farm as a good farmer is prepared to alter their farming plan without compromising good farming practices throughout the season.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				There should be no blanket rule for each mapped out zone as each individual farm in every zone has its own positive and negative issues and should be treated as an individual and dealt with as such. Each farmer should be encouraged, educated and supported in taking charge of their direct receiving environment.
47.27	Balfour, Wendonside & Waikaia Group	Appendix N	Support in part	We seek that the word 'range' is removed from Point 5.  Security from ES regarding the confidentiality of this information.
48.40	Ballance Agri-Nutrients	Appendix N	Support in part	Amend to read: Appendix N – <u>Farm</u> Management Plan Requirements And Amend point 6 of part 3 (which relates to maps and aerial photographs), so that the bullet point reads “where known the location of any subsurface drainage...”. And Delete (a) (ii) of Part 6 – Riparian Management Plan does not appear to fit within this section, in this respect, it refers to ‘critical source areas’ rather than riparian management, and perhaps moved to section 5 – Good Management practices. See original submission for detail.  Oppose the timeframes required to prepare Nutrient Budgets and Farm Environmental Plans and seeks to ensure that Southland Regional Council must carefully consider the timeframes, in consultation with affected parties, implementing timeframes that are appropriate and achievable. See original submission for detail.
54.17	Bayswater Dairy Ltd	Appendix N	Support Amend	Include more detail around the “Environment Southland Register of Independently Audited Self-Management Participants”.
56.8	BEATTIE Michael & Lynley	Appendix N	Support	I question the need for a nutrient budget for sheep & beef farms with stocking rates that are grazing their own animals. More time is needed to draw up & implement these plans if ES wants farmers to buy in the plans to be done properly.
62.15	Beef + Lamb NZ	Appendix N	Support in part Amend	Be more specific about Environment Southland’s expectations around actions for ‘annual review of input data. Keep the Farm Environment Plans simple and easy to engage in. And Amend Appendix N to read:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>The following definitions are relevant to Appendix N.</p> <p><del>Critical Source Area means: Areas of enriched nutrient or sediment sources and hydrological activity that occur in small parts of a catchment or farm, but contribute a disproportionately large amount of nutrient or sediment to the environment (e.g. steep hills, gullies or swales).</del></p> <p>Part A – <del>Farm Environment Management Plans</del></p> <p>A <del>Farm Environment Management Plan</del> can be based on either of:</p> <ol style="list-style-type: none"> <li>1. the material set out in Part B below; OR</li> <li>2. industry prepared <del>Farm Environment Management Plan</del> templates and guidance material that: ...</li> </ol> <p>Part B – <del>Farm Environment Management Plan Content</del></p> <ol style="list-style-type: none"> <li>1. A written <del>Farm Environment Management Plan</del> is: <ul style="list-style-type: none"> <li>• prepared and retained, identifying the matters set out in numbers 2–10 below;</li> <li>• <del>updated</del> <del>reviewed</del> at least once every 12 months; and</li> <li>• provided to the Southland Regional Council upon request.</li> </ul> </li> <li>2. The following property details are recorded: <ul style="list-style-type: none"> <li>• physical address;</li> <li>• description of the ownership and name of a contact person;</li> <li>• <del>legal description of the land and farm name;</del></li> <li>• <del>details of all resource consents held, including a copy of each consent.</del></li> </ul> </li> <li>3. A map(s) or aerial photograph(s) at a scale that clearly shows: <ul style="list-style-type: none"> <li>• the boundaries of the property;</li> <li>• the location of significant farm infrastructure;</li> <li>• the location of any critical source areas <u>within intensive winter grazing and cultivated areas of the property</u>;</li> <li>• the physiographic unit(s) in which the land is located;</li> <li>• the location of permanent or intermittent rivers, streams, lakes, drains, ponds or wetlands;</li> <li>• where known <u>by the property owner</u>, the <u>location</u> of any subsurface drainage system(s) and relative depth and position , including the outlet(s) of any such systems;</li> <li>• the location of riparian vegetation and fences adjacent to waterbodies;</li> <li>• the location on all water ways where stock access or crossing occurs;</li> <li>• the location of any known and recorded heritage site;</li> </ul> </li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>• the location of any areas within or adjoining the property that are identified in a District Plan as “significant indigenous biodiversity”.</li> </ul> <p>4. Nutrient Budget</p> <p>(a) A nutrient budget <del>based on soil nutrient tests</del> has been prepared, using the latest version of the OVERSEER model, in accordance with the latest version of the OVERSEER Best Practice Data Input Standards, or an equivalent model approved by the Chief Executive of Southland Regional Council:</p> <p>(i) where a material change in the land use associated with the farming activity occurs (being a change exceeding that resulting from normal crop rotations or variations in climatic or market conditions) the nutrient budget shall be prepared at the end of the year in which the change occurs, <del>and also three years after the change occurs;</del></p> <p><del>(ii) where a material change in the land use associated with the farming activity does not occur, the nutrient budget shall be prepared once every three years;</del></p> <p>(iii) an annual review of the input data used to prepare the nutrient budget shall be carried out by or on behalf of the landowner for the purposes of ensuring the nutrient budget accurately reflects the farming system. A record of the review shall be kept by the landowner.</p> <p>5. Good Management Practices</p> <p>(a) <del>A good management practices section which identifies:</del></p> <p>(i) the general good management practices which will be undertaken on farm over the coming <del>4 June to 31 May</del> <u>12 month</u> period. Examples of general good management practices are provided on the Southland Regional Council website.</p> <p>(ii) the physiographic zones, and variants (where applicable) within the property;</p> <p><del>(iii) the key transport pathways and contaminants (where applicable) for each of the physiographic zones within the property, from Table 1 below;</del></p> <p>(iv) <del>any</del> <u>the</u> good management practices for any relevant key transport pathways which will be undertaken on farm over the coming <del>4 June to 31 May</del> <u>12 month</u> period. A list of example actions to consider for each of the mitigations is provided on the Southland Regional Council website;</p> <p>(v) upon 12 monthly review, the good management practices that were undertaken in the previous <del>4 June to 31 May</del> <u>12 month</u> period and the good management practices to be implemented over the coming <del>4 June to 31 May</del> <u>12 month</u> period;</p> <p><del>(vi) a range of good management practices will be implemented each year.</del></p> <p>6. Riparian Management <del>Plan</del></p> <p>(a) <del>A Riparian Mmanagement Plan is considered prepared and implemented, and recorded in</del></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>written and/or map form:</p> <ul style="list-style-type: none"> <li>(i) methods to exclude stock, where required, from waterbodies, <del>critical source areas and riparian areas</del>;</li> <li>(ii) <del>in relation to sheep, the mitigation measures to manage critical source areas to ensure contaminant losses, particularly associated with overland flow, are minimised.</del></li> <li>(iii) <del>the mitigation options to minimise overland flow including areas where stock will be excluded and areas where vegetation will be planted;</del></li> <li>(iii) the <u>location type</u> of <u>riparian</u> vegetation to be planted <del>and how it will be maintained</del>;</li> <li>(iiiiv) <del>the grazing of appropriately fenced riparian margins for weed control purposes;</del></li> <li>(iv) the access to waterways for maintenance purposes, <del>and in particular the waterways that are maintained by the Southland Regional Council in accordance with the Southland Flood Control Management Bylaw 2010.</del></li> <li>(v) <u>how riparian areas will be maintained.</u></li> </ul> <p>(b) <del>An up to date copy of the Riparian Management Plan is kept and provided to the Southland Regional Council upon request.</del></p> <p>7. Cultivation</p> <ul style="list-style-type: none"> <li>(a) A cultivation map showing: <ul style="list-style-type: none"> <li>(i) waterbodies;</li> <li>(ii) buffer strips along those waterbodies as follows: <ul style="list-style-type: none"> <li>(1) <del>3 m buffer where slopes are 4 degrees or less</del> <u>3 metre buffer for slopes up to 10 degrees</u></li> <li>(2) <del>10 m buffer where slopes are greater than 4 degrees and up to 16 degrees</del> <u>10 metre buffer for slopes 10 to 20 degrees</u></li> <li>(3) <del>20 m buffer where slopes are greater than 16 degrees</del> <u>15 metre buffer for slopes 20 to 30 degrees</u></li> <li>(4) <del>as specified in resource consent conditions where the slopes are greater than 20 degrees;</del></li> </ul> </li> <li>(iii) land where cultivation is planned over the next <u>12 month</u> period <del>1 June to 30 May</del>;</li> <li>(iv) any proposed good management practices for cultivation, such as contour ploughing, strip cultivation or minimum tillage.</li> </ul> </li> </ul> <p>8. Intensive winter grazing</p> <p>Where intensive winter grazing is undertaken, <del>an intensive winter grazing section which contains:</del></p> <ul style="list-style-type: none"> <li>(a) Good management practices:</li> </ul>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(i) to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land for intensive winter grazing;</p> <p><del>(ii) to avoid the conspicuous discolouration or sedimentation of any adjacent waterbodies;</del></p> <p>(b) an intensive winter grazing map showing the total extent of land that may be intensively winter grazed on the property which includes the following details in respect to that land:</p> <p>(i) the extent of land to be intensively winter grazed for the next <u>winter</u> period, 1 May to 30 September <u>inclusive</u>;</p> <p>(ii) critical source areas;</p> <p>(iii) waterbodies;</p> <p><del>(iv) slope classes;</del></p> <p><del>(v) buffer strips;</del></p> <p>(vi) location of sub-surface drains their outlet position and relative height, <u>where known by the property owner</u>. ...</p> <p>10. Irrigation Management (applies to farming activities that irrigate):</p> <p><del>(a) All irrigation systems installed or replaced after 1 October 2015 meet the Irrigation New Zealand Piped Irrigation Systems Design Code of Practice 2013, Irrigation New Zealand Piped Irrigation Systems Design Standards 2013 and the Irrigation New Zealand Piped Irrigation Systems Installation Code of Practice 2013.</del></p> <p><del>(b) The irrigation system application depth and uniformity are self checked annually in accordance with the relevant Irrigation NZ Pre Season Checklist<sup>28</sup> and IRRIG8Quick Irrigation Quick tests<sup>29</sup> for any irrigation system operating on the property.</del></p> <p><del>(c) Irrigation applications are undertaken in accordance with property specific soil moisture monitoring, or a soil water budget, or an irrigation scheduling calculator. Soil monitoring means monitoring soil moisture using either volumetric or tension based methodology.</del></p> <p><del>(d) Records of irrigation system application depth and uniformity checklists, irrigation applications, soil moisture monitoring or soil water budget or irrigation scheduling calculator results and rainfall are kept and provided to the Southland Regional Council upon request</del></p> <p><u>(a) Irrigated areas are mapped; and</u></p> <p><u>(b) Any relevant good management practices which will be undertaken on farm over the coming 12 month period are noted. A list of example good management actions to consider is provided on the Southland Regional Council website;</u></p>
63.6	BEGGS N W & C E	Appendix N	Neutral	More clarity on who is responsible for preparing and maintaining Farm Management Plans (FMP).

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				Education and templates provided to those responsible. Application of the mapping wording within FMP to relevant drainage rule sections.
68.2	BENNETT Raymond	Appendix N	Oppose	On page management plan acceptable. Don't need maps etc. that's what google is for and we must be allowed to do it ourselves.
69.3	Best AG Ltd	Appendix N 7(iii)	Amend	When creating a whole Farm Management Plan, identify the total hectares that are appropriate for cropping on one property, enabling the farmer to choose paddocks, as long as they are within the hectare and contour limits, at a time that suits the farmer. The area could be reviewed every three years with the plan.
71.4	Beulah Organics NZ (BONZ)	Appendix N	Amend	We support a management plan in part. We don't want the cost to be prohibitive and the frustration of time delays on consents. We do not want to be applying for multiple resource consents.
73.16	BLACK Family Trust	Appendix N	Oppose	A later date for the implementation of this Plan as the time frame is too short, bearing in mind that most farmers are busy with the practical side of farming and burdening them with more paperwork will take time.  Rather than being an annual plan it would be better as a longer term plan e.g. 5 years, as that gives the farmer time to fulfil these obligations where there has had to be a change due to adverse conditions. This Plan to be reviewed annually without cost to the farmer, eliminating the need for gaining further consent which could also prove costly.
75.2	BLACKMORE Neil	Appendix N	Oppose	Absolutely essential is should be simple, practical and inexpensive in both time and financial.
80.22	BLAKELY Barney & Stephanie	Appendix N		Only clause 5 Good Management Practices should be included.
81.25	BLAKELY Hamish & Hannah	Appendix N		Remove all clauses under Appendix N, except for #5. Only good management practices should be included. If farm management plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management.
82.8	BLOMFIELD M J & K G Trust	Appendix N	Support	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.
83.8	BOKSER Greg	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent on most aspects of this plan. The timeframe for completion extended to 2025.

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85.4	BOWMAR Lindsay & Joanne	Appendix N	Oppose	All of these plans should not be enforced but encouraged as best practice.
86.6	BOWMAR Ross	Appendix N	Oppose	<p>Removal of the requirement for all farms over 20ha to produce annually a management plan.</p> <p>Set all nutrient budget levels at the level of the most intensive practice. This creates a fair future opportunity for all land owners.</p> <p>Any riparian management plan should say where practical in relation to fencing off waterways. Where the practical is determined by the landowner.</p> <p>Any modification to the river channel should be in consultation with the landowner and not a given right for Environment Southland to make changes.</p> <p>One distance of 3m for all waterways and not ambiguity created by having differing buffer strip distances.</p> <p>Completely remove the requirement for a resource consent for cultivating land greater than 20 degrees.</p> <p>Completely remove the requirement for a cultivation map.</p>
87.5	Braemore Farms Ltd	Appendix N	Oppose	<p>Abolish the requirement for farm management planning.</p> <p>Encourage the use of <u>Good Farm Management Practices</u> by working with industry good organizations such as:</p> <ul style="list-style-type: none"> <li>-Beef and Lamb NZ</li> <li>-Federated Farmers</li> <li>-Young Farmers Clubs.</li> </ul>
89.42	BRENTLEIGH Family Trust	Appendix N	Amend	Remove all clauses under Appendix N, except for number 5. If Farm Management Plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management. ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.
92.16	Bristol Grove Dairies	Appendix N	Oppose	Who will pay for farmers time to put this together? Who will own the gathered information?

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93.9	Broadacres Ltd	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent on most aspects of this plan. The timeframe for completion extended to 2025.
96.4	BROWNING Stuart	Appendix N	Neutral	Change the period for updating to a period of 1 to 5 years which the farmer can select, unless they make any significant changes i.e. apply for a resource consent.
98.2	BRYSON M J & L M	Appendix N	Oppose Amend	I support using farm environment plans to help identify environmental impact. ES could improve my environment plan and avoid the use of multiple resource consents.
100.6	BUCKINGHAM Janette	Appendix N	Oppose	Remove management plan requirement.
102.8	Burwood Station Ltd	Appendix N	Support Oppose	I would like the information within these plans to be submitted to the Council, therefore reducing the need for consents where farms are operating in accordance with best practice. Land owners should be able to change their mind where to cultivate as long as they stick to good buffer zones along waterways.
107.7	BYARS Richard	Appendix N	Oppose	Exempt sheep farming at least until 2020.
108.111	BYTHELL Jesse	Appendix N		In regards to Riparian Management Plans specified in Appendix N, I seek that the council encourage where practical the use of eco-sourced and locally appropriate native species, particularly in any restoration plantings at sites where indigenous vegetation remains or sites in proximity to significant indigenous vegetation. I ask that the council discourages the planting of species which are known to readily invade wetlands but are not listed in the Regional Pest Management Strategy, such as silver birch ( <i>Betula pendula</i> ) or mountain ash ( <i>Sorbus aucuparia</i> subsp. <i>Aucuparia</i> ).
118.13	Carmyllie Farm	Appendix N	Oppose	Farm management plans - what level of detail is appropriate? Should a nutrient budget be required for all farm types? Limit to areas for intensive winter grazing, currently 20 or 50ha limits. Should there be a percentage of landholding limit for larger farms?
123.6	Caughey Ltd	Appendix N		I don't want to have to do a farm plan and multiple resource consents. Some of the information you are asking me to provide is difficult and not clear. Please make the farm plan as simple as possible for me to complete.
127.2	CHISMAN Trust	Appendix N	Oppose	The unsustainable cost of a farm management plan needs to be addressed.
136.5	CLARKE Alanna	Appendix N	Oppose	Delete the Nutrient Budget requirement and replace with a self-assessed management plan which can still be obtained by and consulted with Environment Southland by request.
139.8	CLARKE David	Appendix N	Support	Delete the Nutrient Budget requirement and replace it with a self-assessed management plan which can still be obtained by and consulted with Environment Southland.

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				<p>Still use and update the Focus Activity Farm Plans that have already be done and update every second year.</p> <p>For farms that don't currently have a FAFP, they could have a compulsory visit from a Land Sustainability Team member every second year to CSA's, and future winter crop paddocks.</p>
142.4	CLEARWATER G S & M A	Appendix N	Support Amend	I agree with farm management plans Appendix N, provided a template is produced by ES that the farmer can complete without the need for a consultant.
147.9	CLEMENT Karina	Appendix N	Support	Retain.
148.6	CLEMENT Paul & Linda	Appendix N	Oppose	We recommend Environment Southland work with farmers to develop good management practices rather than impose more paperwork on them.
153.5	Coalbrook Partnership	Appendix N	Oppose	Simplify the plan requirements and change so it is only required to be updated every 5 years.
155.10	Coasthaven Farms Ltd AND Paterson Gavara Trust	Appendix N – Management plan requirements	Support	Retain. However we oppose any audit process to enforce timelines on Farm Management Plans. This is because farming economics and profitability are volatile. Example – if a plan has direction and guidelines with some flexibility around time lines. Enforced capital expenditure (eh planting & fencing) during times of rural hardship can be mitigated.
156.16	COCKBURN Grant & Rachel	Appendix N	Support	Indicate how much effect the example GMPs in the ‘Deep drainage of nitrogen’ Factsheet has on reducing N loss on riverine PZs.
157.6	COGHLAN K P & W A	Appendix N	Oppose	I am firmly opposed to compulsory management plans.
158.8	Colin Woodrow Ltd	Appendix N	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years. This would pick up issues on farms and create good working relationships, without hassles of compliance officers being involved.
160.9	COLLING Megan	Appendix N	Amend	Make the rules consistent across all the physiographic zones. Change review to every 3 years. Costs to maintain and enforce should be included. Should only be fenced if practical as a lot are not.
176.5	Crayburn Farm Trust	Appendix N	Oppose	Remove Appendix N7 cultivation. Instead of a yearly audited plan a five or eight year plan would be more realistic. Delete Subsurface Drains.
178.5	Crooks Dairy Ltd	Appendix N	Oppose	Every farm could have a 2 to 3 yearly visit from ES. This way the farmer could show ES what he is doing and ES could give advice on what could be changed. This would save a huge amount

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				of pointless paper work.
179.9	CROOKS Jonathan Ross & Sarah Jane	Appendix N		<p>We support education via the Land Sustainability team via a bi-annual visit instead of completing farm management plans.</p> <p>We suggest that if these plans remain a requirement of the Plan that they are to be submitted triennially. If these plans must be completed, there needs to be simple ability within the framework to adjust your farm management plan for subtle changes or seasonal requirements – i.e. pest infestation in a pasture paddock may require unplanned cultivation.</p>
182.2	Currie Farm Ltd	Appendix N		I would like the Management Plan requirements to be kept as simple as possible to encourage the completion of them.
185.4	D J & D A Anderson Ltd	Appendix N	Amend	E.S to provide us with condensed booklet/template(s) relevant to the different farm types i.e. dairy, sheep/beef, deer with typography considered. Definitions included, without us having to refer to SRC website for definitions and trying to interpret them.
186.7	D R & J A E Pullar Ltd	Appendix N	Amend	<p>Remove the requirement for mapping of sub surface drainage location and relative depth.</p> <p>The Environment Management Plan template as proposed is a confusing mixture of time periods. In stating how the management plan is to be set out, the intent should be to cover one biological year. The objective should be to include the cultivation, growing and grazing of winter crops that are considered as intensive winter grazing in one twelve-month plan. These events all occur within one twelve-month period. The land manager should determine the commencement date for the twelve-month plan. This will allow it to best fit the management programme for the property. For these management plans to work they must be simple to manage, write and understand.</p>
189.50	Dairy Holdings Ltd	Appendix N		<p>Amend Part A:</p> <p>A Management Plan can be based on either of:</p> <ol style="list-style-type: none"> <li>1. the material set out in Part B below, <u>noting that where there are inconsistencies between the material set out in Part B and the conditions in a resource consent, then the material required by the conditions in a resource consent should prevail</u>; OR</li> <li>2. [retain as notified]</li> </ol> <p>Insert Part B(4)(b):</p> <p><u>A nutrient user group may be used to collectively manage nutrient losses from properties in single or multiple ownership where the nutrient user group has been granted resource consent</u></p>

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				<p>by <u>Environment Southland</u>.</p> <p>Amend Part B(5)(a)(i): the general good management practices which will be undertaken on farm over the coming 1 June to 31 May period. Examples of general good management practices are provided on the Southland Provincial Council website, <u>and further guidance can be taken from the “Industry-Agreed Good Management Practices Relating to Water Quality<sup>10</sup>”</u></p> <p>Amend Part B(5)(a)(vi): A range of good management practices will be implemented each year, <u>taking into account factors such as social, economic and environmental costs and benefits to determine the most prudent and beneficial practices to implement.</u></p> <p>Amend Part B(7)(a)(ii) to include a new footnote: <u>* In limited instances the location of existing fencing and the location of the waterbody may require limited cultivation closer than the setbacks set out (this is permitted provided that the average set back remains the distance stated).</u></p> <p>Amend Part B(8)(b)(vi): location of <u>new or upgraded</u> sub-surface drains, their outlet position and relative height.</p> <p>Amend Part B(9)(b): Records of the application, separation distances, depth, uniformity and intensity of dairy effluent disposal, in accordance with <del>(e)(ii)</del> <u>9(a)</u> above, are kept and provided to the Southland Provincial Council <u>on request</u>.</p>
190.22	DairyNZ	Appendix N		Amend to consolidate planning requirements, and more effectively utilise existing planning approaches (e.g. Sustainable Milk Plans) that are being used at the national level rather than introducing customised arrangements that have the potential to duplicate existing initiatives and

<sup>10</sup> Published by the Canterbury Matrix of Good Management project in September 2015. Available at:  
[http://ecan.govt.nz/publications/General/Industry-Agreed\\_GMPs\\_A5\\_Version2\\_Sept2015\\_FINAL.pdf](http://ecan.govt.nz/publications/General/Industry-Agreed_GMPs_A5_Version2_Sept2015_FINAL.pdf)

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				increase business compliance costs. Amend to be consistent with existing initiatives.
191.14	DALE J M & K B	Appendix N	Oppose	ES work with farmers to accumulate templates and tools for management plans that don't require annual fees.
194.7	Davie Justin	Appendix N	Oppose	Far too much time and money to be spent annually. Better off with a simple plan farmers can do themselves with a compliance check every 5 years. Make it easy to update changes without the requirement to do it annually, essentially from square 1 again.
199.4	DICKIE Alan & Valerie	Appendix N	Oppose	Delete requirements for cultivation plan.
205.37	Dillon Ag Ltd (Chris Dillon)	Appendix N	Amend	<ul style="list-style-type: none"> <li>Remove all clauses under Appendix N, except for #5</li> <li>Only Good Management practices should be included.</li> <li>If Farm Management Plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management.</li> </ul> <p>ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.</p>
206.37	Dillon Ag Ltd (Rochelle Dillon)	Appendix N	Amend	<ul style="list-style-type: none"> <li>Remove all clauses under Appendix N, except for #5</li> <li>Only Good Management practices should be included.</li> <li>If Farm Management Plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management.</li> </ul> <p>ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.</p>
208.7	DILLON M J & S E	Appendix N	Amend	Appendix N(B) (4)(a) - Add criteria they will approve on and how you go about getting approval for an alternative model.
210.100	Director-General of Conservation	Appendix N	Support in part.	Amend Table 1 to include all key transport pathways as outlined in the descriptions of the Physiographic Zones and in the DoC submission.
211.5	DITCHFIELD Dylan	Appendix N	Support	Retain.
212.5	DODD N R & J L	Appendix N	Oppose	Farm management plan needs to be simpler to complete and more user friendly. Reviewed every 3-5 years. Our farming style, sheep and beef, doesn't change.
215.5	Dooley Partnership	Appendix N	Support Amend	I like the idea, but it needs to be simple and as cheap as possible. We need to ensure the transition is smooth and easy, with a good couple of years working with you to get our heads around it.
219.7	DRUMMOND R G & J M	Appendix N	Support	We generally support management plans after taking in to account areas we have highlighted as



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				long as flexible on ways to achieve good outcomes.
220.18	Drylands Farming Ltd	Appendix N	Oppose in part	Leave Overseer outside of the plan until such time as it is peer reviewed as being suitable as a regulatory tool.
221.18	DRYSDALE Family Trust	Appendix N	Oppose in part	Leave Overseer outside of the plan until such time as it is peer reviewed as being suitable as a regulatory tool.
222.5	DUFF Bradon	Appendix N	Oppose	Far too complex and costly document which is not effects based.
223.4	DUFF Farms	Appendix N		Keep the Management Plan down to a single page of data, so it can be done by all farmers quickly.
226.2	DUMBLETON D L & M	Appendix N	Amend	Those landowners whose operations are deemed to be lower impact agriculture (such as sheep and beef) only have to complete a minimal farm environmental management plan that can be easily completed themselves without the assistance of a consultant. This would ensure that the costs of compliance are proportional to the income generated by a farming operation and its impact on the environment.
227.4	DUNBAR M	Appendix N	Oppose	Delete.
228.2	DUNCAN A	Appendix N	Oppose	Delete Farm Environmental Management Plan requirements.
231.3	DYER Stephen	Appendix N	Oppose	Delete requirement for a Farm Management Plan.
233.31	DYSON Valerie &Glyn	Appendix N	Amend	Delete part b (2): details of all resource consents to be held. Delete part b(3). Delete part b(4): Nutrient Budget. Provision in parts 7 and 8 to keep updating the area of land to be cultivated as and when that decision is made on farm. Retain parts 1,2,5,6,9 and 10.
235.3	EADE G T & F A	Appendix N	Oppose	Need to educate!! Inform farmers of better management practices, rules consistent across all zones. Compulsory membership to a Catchment Group and promote better management practices. Example, (Sheep – 3/4 day breaks in winter) including crop.
236.3	East Dome Farms Ltd	Appendix N	Support	As an alternative I propose the Management Plan should only need to be reviewed every 5 years unless major changes to property management.
241.6	Egg Producers Federation of NZ (EPFNZ)	Appendix N		Appendix N Part B(4) - Requirements in accordance with Appendix N at this stage are not suitable for the poultry industry given the use of OVERSEER. Where there is no equivalent model, the poultry industry cannot meet the permitted activity criteria and would default to a non-complying activity status. In the absence of an equivalent model, the establishment of the IASM system is critical to the poultry industry.  We request that Environment Southland work with the poultry industry to develop an

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				<p>appropriate framework and implementation methods for an IASM system.</p> <p>Part B(6), (7), (8)</p> <p>Include a similar clarification to section (6)-(9) as there is for section (10) to improve clarity. Alternatively an advice note near the beginning of Appendix N could direct a user preparing an FEMP that it is appropriate/acceptable to simply state 'not applicable' if that is the case.</p> <p>Part B(9)</p> <ul style="list-style-type: none"> <li>• Confirmation of whether this section is intended for specific industries;</li> <li>• Where specific industries are the focus, to identify those activities clearly;</li> </ul> <p>Where relevant to all industries, but where information requirements may differ, to clarify these requirements and overall clarify the expectation of this section and scope.</p>
246.7	ENGLISH Hamish	Appendix N	Oppose	Revert to previous plan requirements.
247.30	Environment Southland	Appendix N	Amend	Amend the 6th bullet point, of Part B.3, Appendix N to read: where known, the <u>location</u> of any subsurface drainage system(s) and relative depth and position, including the outlet(s) of any such systems.
247.31	Environment Southland	Appendix N	Amend	Replace '1 June to 31 May', whenever it appears in Part B.5 of Appendix N with '12 month'.
247.32	Environment Southland	Appendix N	Amend	<p>Remove (iii) and revise (ii) as follows:</p> <p>(ii) <del>in relation to sheep</del>, the mitigation measures to manage critical source areas to <u>reduce ensure</u> contaminants losses, particularly associated with overland flow, <del>are minimised</del> <u>such as areas where stock will be excluded and where vegetation will be planted.</u></p> <p>Amend Part B.7(a)(ii) as follows:  buffer strips along those waterbodies <del>as follows:</del></p> <ol style="list-style-type: none"> <li><del>(1) 3 m buffer where slopes are 4 degrees or less</del></li> <li><del>(2) 10 m buffer where slopes are greater than 4 degrees and up to 16 degrees</del></li> <li><del>(3) 20 m buffer where slopes are greater than 16 degrees</del></li> <li><del>(4) as specified in resource consent conditions where the slopes are greater than 20 degrees;</del></li> </ol> <p>Amend Part B.7(a)(iii) as follows: land where cultivation is planned over the next <u>12 month</u></p>

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				<p>period 1 June to 30 May;</p> <p>Delete Part B.9(c).</p> <p>Replace current wording of Appendix N Part B.9 with the following:</p> <p><u>9. Effluent Management Plan</u></p> <p><u>An Effluent Management Plan is prepared and implemented, and records in written and/or map form:</u></p> <p>(a) <u>a plan of how effluent will be managed when soils are at or above field capacity and/or during adverse weather conditions;</u></p> <p>(b) <u>a maintenance schedule for effluent disposal infrastructure (maintenance of irrigators, checking anti-siphon/switch-off systems, desludging the pond etc);</u></p> <p>(c) <u>identification of drains, surface waterways, sub-surface drainage and critical source areas in the effluent disposal area so that the risk of effluent entering water can be avoided; and</u></p> <p>(d) <u>a plan of how effluent application rates will be monitored to ensure the consent requirements are being met.</u></p> <p>Make minor amendments as required.</p>
248.5	Erne Hill Ltd	Appendix N	Amend	Part B 3, fifth bullet point – include definition of these items. Sixth bullet point – where know the location (missing). A review of the nutrient budget could be done every ten years.
251.3	Euan Crump Farming Co Ltd	Appendix N	Oppose	Oppose, however support the need for nutrient budget.
252.5	EVANS Blair	Appendix N		Develop an online Management Plan that farmers can use and access without the need for consultants/external and higher costs. Should be online, drop down boxes, linked to others i.e. SDC for title areas, maps so farmers can draw in new fences, crop paddocks, ponds etc. Ideally a management plan should be simple enough that say 75% of farmers could complete without external input.
253.7	EVANS Frederick & BROCKMAN Carla	Appendix N	Support in part	Too much is being required of us in the timeframes which spin our heads. This document, when produced, should be reviewed and amended when conditions or practices change. Set the timeline further in the future, the plan deadlines should coincide for all physiographic types.
257.6	EVANS O R & T D	Appendix N	Amend	<p>Amend so only have to create a plan if crating an obvious environmental imbalance.</p> <p>All taxpayers should pay for the cost of these plans if we are forced to do this as it is supposedly</p>

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				for the benefit of all New Zealanders.
258.29	Eyre Creek Ltd	Appendix N	Oppose	Management plans only be required to submit to ES if there is a scientifically proven issue as a result of a farming practise on a particular farm. The request of a management plan must be in writing to the farmer concerned with 20 working days' notice. Add a statement that the information within the management plan remains the property of the farmer. Review and reduce the management plan requirements. E.g. information already held by ES such as resource consents. Plus, delete drainage maps and heritage sites. Extend the need to review the management plan out to 5 yearly. Change the Nutrient budget to be a separate document that requires annual review.
259.18	F D Enterprises Ltd	Appendix N	Support in part	I seek that the word 'range' is removed from Point 5.
262.6	Fairview Eastern Bush Ltd	Appendix N	Amend	Five to ten year management plans with free advisers.
265.109	Federated Farmers of NZ (Southland Province)	Appendix N	Support in part	<p>Amend Appendix N as follows:</p> <p>Part A</p> <p>A Management Plan can be based on either of:</p> <ol style="list-style-type: none"> <li>1. the material set out in Part B below <u>which may be updated through the year</u>; OR</li> <li>2. industry prepared Management Plan templates and guidance material that: <ul style="list-style-type: none"> <li>(a) includes the material set out in Part B below, <del>contains a methodology that will enable development of a plan that will identify actual and potential environmental effects and risks specific to the property, addresses those effects and risks and has a high likelihood of appropriately avoiding, remedying or mitigating those effects, includes objective performance measures; and</del></li> <li>(b) has been approved as meeting the criteria in (a) and being acceptable to the Southland Regional Council by the Chief Executive of the Southland Regional Council.</li> </ul> </li> </ol> <p>Part B</p> <p>2. The following property details are recorded:</p> <ul style="list-style-type: none"> <li>• physical address;</li> <li>• description of the ownership and name of a contact person;</li> <li>• legal description of the land and farm name;</li> <li>• <del>details of all resource consents held, including a copy of each consent.</del></li> </ul>

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				<p>3. A map(s) or aerial photograph(s) at a scale that clearly shows:</p> <ul style="list-style-type: none"> <li>• the boundaries of the property;</li> <li>• the location of significant farm infrastructure;</li> <li>• the location of any critical source areas;</li> <li>• <del>the physiographic unit(s) in which the land is located;</del></li> <li>• the location of permanent or intermittent rivers, streams, lakes, drains, ponds or wetlands;</li> <li>• <del>where known, the of any subsurface drainage system(s) and relative depth and position, including the outlet(s) of any such systems;</del></li> <li>• the location of riparian vegetation and fences adjacent to waterbodies;</li> <li>• the location on all water ways where stock access or crossing occurs;</li> <li>• <del>the location of any known and recorded heritage site;</del></li> <li>• the location of any areas within or adjoining the property that are identified in a District Plan as “significant indigenous biodiversity”.</li> </ul> <p>DELETE 4. Nutrient Budget and replace with 4. Soil Test and Fertiliser Plan (for farms that do not have a current Nutrient Budget using Overseer).</p> <p>DELETE Table 1.</p> <p>6. Riparian Management Plan</p> <p>(a) A Riparian Management Plan is prepared and implemented, and records in written and/or map form:</p> <p>(i) methods to exclude stock, where required, from waterbodies, critical source areas and riparian areas;</p> <p>(ii) in relation to sheep, the mitigation measures to manage critical source areas to ensure contaminant losses, particularly associated with overland flow, are minimised.</p> <p>(iii) the mitigation options to minimise overland flow <del>including areas where stock will be excluded and areas where vegetation will be planted</del> (for example, stock exclusion or planting <u>vegetation</u>);</p> <p>(iii) <u>if planting vegetation is appropriate</u>, the type of vegetation to be planted and how it will be maintained;</p>

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				<p>(iv) the grazing of <del>appropriately</del> fenced riparian margins for weed control purposes;</p> <p>(v) the access to waterways for maintenance purposes, and in particular the waterways maintained by the Southland Regional Council in accordance with the Southland Flood Control Management Bylaw 2010.</p> <p><del>(b) An up-to-date copy of the Riparian Management Plan is kept and provided to the Southland Regional Council upon request.</del></p> <p>Amend Appendix N so that a Cultivation Map is only required for farms with crops that will not be intensively winter grazed.</p> <p>9. Collected Agricultural Effluent</p> <p>(b) Records of the application, separation distances, depth, uniformity and intensity of dairy effluent disposal, <del>in accordance with (c)(ii) above,</del> are kept and provided to the Southland Regional Council <u>when a compliance issue arises</u>.</p> <p>(c) The application of collected agricultural effluent is avoided, <u>where practical</u>, when the soil temperature is less than 5 degrees C.</p>
266.7	Fenham Downs Ltd	Appendix N	Oppose	Management plan – clarify who is going to come and do it, who is going to pay for it to get done.
275.5	FLETT Alan	Appendix N	Oppose	Best practise for this in the form of a booklet, try to cut down on paper work and let us get on with the job.
277.60	Fonterra Co-operative Group Ltd	Appendix N	Oppose in part	Amend the cultivation section of Appendix N to reflect the changes to rule 25 sought by Fonterra in submission point <b>Error! Reference source not found.</b> namely that: a 3 metre setback is required on slopes of less than 4 degrees, and above 4 degrees a 1 metre setback for every degree of slope up to 16 degrees.
278.2	FORDYCE Gary	Appendix N	Amend	Needs to be a simple form that can be filled out by the farmer or manager.  Oppose the use of overseer in the Management Plan. Council should set up a template on nutrient budget.
279.124	Forest & Bird NZ	Appendix N	Support with	Retain but amend Table to include Lateral Drainage in the list of key transport pathways for

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			amendment	Peat Wetlands.
292.18	G S & M A Clearwater Ltd	Appendix N	Support Amend	I strongly support management plans being completed by farmers rather than consultants. Although Overseer is widely used I am not convinced it is the best way forward to all farmers. Retain GMP.
294.6	Gardyne Agriculture Ltd (Duncan Gardyne)	Appendix N	Oppose	Oppose submitting a management plan as good farming practices should suffice.
295.6	Gardyne Agriculture Ltd (Fred Gardyne)	Appendix N	Oppose	Have no farm management plan, implement good farming practices instead.
296.9	GARDYNE G W & E L Trust & C K Gardyne Ltd	Appendix N	Amend	Nutrient budget should only need to be done for dairying farms and those with a high proportion of winter grazing.
297.13	GARDYNE Hugh & Kathie	Appendix N		<p>Remove necessity to undertake nutrient budgets on dry stock properties not undertaking intensive wintering of cows or engaged in intensive cereal or specialist cropping systems, unless there is a change to intensive management practice(s) warranting the completion of a nutrient budget.</p> <p>Include: Livestock – non dairy. No intensive grazing less than 10% by area in winter or fodder crops. Sheep and cattle all grass system with no additional stock wintered on or winter feed purchased. Nitrogen fertiliser less than 10% by volume of total fertiliser applied. Nutrient losses of less than 25 units Nitrogen per Hectare per annum or within nutrient limit settings.</p> <p>Amend so landowners with good farm practices, stocking rates, livestock types and profiles not required to update plans annually, unless there are significant changes to any of these components, or complaints notified to ES.</p>
298.9	GARDYNE Joanne	Appendix N	Oppose	Requested information asked for is too much and compliance will be minimal. Keep it simple and have the focus on encouraging good farming practice.
299.22	GARDYNE John	Appendix N	Oppose	Too much detail. Needs to be easy to fill in and aim for good management practice. No nutrient budgets, better to have soil tests. Map only wintering areas.
303.3	Garfield Farm Ltd	Appendix N	Oppose	A decision should be made on individual farming practice stocking rates, fertiliser rates etc. Every farm is different.
305.4	GERRARD L J & J A	Appendix N		Landowner management plan changed to be updated every three years like an industry plan and that Environment Southland make available resources and/or staff, <u>at minimum cost</u> to

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				farmers/landowners to help them do their plans.
323.5	Glenshe Trust	Appendix N		Do not make decision on management plan until its detail required within a management plan has been released.
336.7	GRIMM Hamish	Appendix N		Management plan should be a progressive situation started when there is knowledge of a specific problem on a specific farm.
339.16	GUNN Olivia	Appendix N	Support	We support these requirements in principle unless previously stated, but recommend that more detail around the “Environment Southland Register of Independently Audited Self-Management Participants” needs to be included in the Plan.
344.8	Hall Ag Ltd (Glenda Hall)	Appendix N	Oppose	Delete.
345.8	Hall Ag Ltd (John Hall)	Appendix N	Oppose	Delete.
365.11	HEENAN M D and D W	Appendix N		Prepare standard templates and ensure sufficient staff to meet demand. Amend to extend timeframes for riparian planting to tie in with the relevant Freshwater Management Unit under the requirements of the NPS-FM. Amend the wording to reflect the requirements of Rule 25(b)(ii) and (iii) in terms of setbacks for renewing pasture.
372.34	Heritage NZ	Appendix N	Support	Retain.
374.3	High Country Farms Ltd	Appendix N	Amend	Amend Part B # 3 to: Known and new drains to be mapped.
386.18	Hopcroft Farms Ltd	Appendix N	Support in part Amend	Provide clarity on: <ul style="list-style-type: none"> <li>• How the Farm Plans are to be managed</li> <li>• The audit process.</li> <li>• Time period between audits</li> </ul> More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.
387.22	HORRELL Andrew Russell	Appendix N	Support	Be realistic about industries capacity to produce farm management plans in the short term. Provide clarification over who is responsible for producing the farm management plan.
388.3	HORRELL Annette	Appendix N		Environment South needs to provide a free service to any farmer requiring it to complete a plan that is compliant.



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389.9	HORRELL P J & J M	Appendix N		If a Farm Plan is developed and delivered well, then a resource consent should not be required.
390.38	Horticulture NZ	Appendix N	Support in part	<p>Retain Appendix N Part A.</p> <p>AND</p> <p>Amend Appendix N Part B as follows:</p> <ul style="list-style-type: none"> <li>- Under 4 Nutrient Budget a) change 'equivalent model' to 'alternative model'.</li> <li>- Under 6 Riparian Management Plan a) add: A Riparian Management Plan, which takes into the nature and scale of the farming activity, is prepared and implemented and records in written and/or map form: ....</li> <li>- Under 7 cultivation amend: <ul style="list-style-type: none"> <li>ii) 1) 3 metres with a slope under 10 degrees</li> <li>ii) 2) 10 metres where slopes are between 10 – 16 degrees</li> </ul> </li> </ul> <p>10 Irrigation management: Write the requirements as matters to be included in the Management Plan, rather than as conditions.</p>
393.3	HSV Dairy Ltd	Appendix N	Amend	<p>How accurate is information in a nutrient budget?</p> <p>Does this include beef cattle to be excluded from waterways?</p>
399.3	HUMPHRIES Marie	Appendix N	Oppose	Those landowners whose operations are deemed to be lower impact agriculture (such as sheep and beef) only have to complete a minimal farm environmental management plan that can be easily completed themselves without the assistance of a consultant. This would ensure that the costs of compliance are proportional to the income generated by a farming operation and its impact on the environment.
400.3	HUMPHRIES S M A Family Trust	Appendix N	Support in part	<p>Use to avoid too many rules and requirements to get consents.</p> <p>Hold off using Overseer to set nutrient limits and other parameters for five years. Continue to gather data and strengthen as required. Good management practices.</p>
401.3	HUMPHRIES Trevor & Karen	Appendix N	Amend	Do not use Overseer.
402.20	HUNT Alistair & Bernadette	Appendix N	Amend	<p>Delete the methodology requirement from Appendix N, Part A, 2(a).</p> <p>Delete "including a copy of each consent" from Appendix N, Part B, 2, 4<sup>th</sup> bullet point.</p> <p>Delete 4<sup>th</sup> bullet point from Appendix N, Part B, 3.</p>

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				Delete Appendix N, Part B, 5(a)(ii) and (iii) and Table 1. Delete 6 <sup>th</sup> bullet point from Appendix N, Part B, 3. Delete “riparian vegetation and” from the 7 <sup>th</sup> bullet point in Appendix N, Part B, 3. Delete 9 <sup>th</sup> bullet point from Appendix N, Part B, 3. Delete Appendix N, Part B, 4, and include the requirement for soil testing and a fertiliser plan in Appendix N, Part B, 5 for non-dairy farms.
403.2	HUNTER Robert	Appendix N	Oppose	Delete or Environment Southland to cover cost of generating the Plan.
405.3	Huntly Farm Partnership	Appendix N	Support	Change “material change” to “significant or fundamental change”.
410.12	Invercargill Airport Ltd	Appendix N	General support	IAL generally supports the management plan approach to ensuring farming activities operate at good or best environmental practice, but note that in preparing such a plan sufficient regard should be had to surrounding land uses and potential effects on those including that of regionally significant infrastructure.
414.13	Irrigation NZ Incorporated	Appendix N		Suggest the irrigation management section is redrafted to be consistent with the most up to date version of Environment Canterbury’s Farm Environment Plan in its current Plan Change : <u>10. Irrigation Management</u> <u>(a) New irrigation systems are designed and installed and operated in accordance with industry best practice codes of practice and standards</u> <u>(2) Existing irrigation systems have an annual performance assessment and are maintained so as they apply irrigation at their optimal efficiency.</u> <u>(3) All applications of irrigation are justified through soil moisture monitoring or soil water budgets</u> <u>(4) The timing and depth of irrigation applied takes account of crop requirements and soil plant available water.</u> <u>(5) Staff are trained in the operation, maintenance and use of irrigation systems.</u> <u>(6) Records of (1) – (5) are kept and provided to the Southland Regional Council upon request</u>
415.4	IRWIN Doug	Appendix N	Oppose	I strongly object to the suggested huge amount of work involved in annually submitting a farm management plan.  Remove requirement to map tile drains.
416.3	IRWIN Robyn	Appendix N	Oppose	Management Plans to remain confidential between Environment Southland and the farmer.

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				<p>Be proactive. Send out Good Management practices to farmers. Employ more Land Sustainability Officers to engage and educate farmers. Management Plans for high risk zones only.</p> <p>Change all references to subsurface drains to require only new drains to be mapped or to have the phrase “where known” added to the requirement for drains to be mapped for consents, permitted activities and management plans.</p>
417.4	J & K Stone Farming Ltd	Appendix N	Amend	There needs to be clarification around the roles and responsibilities to the leasee and lessor in respect to this plan.
418.3	J McLean Farming Ltd	Appendix N	Oppose	Provide more details surrounding the financial implications of implementing a Management Plan and what support ES will provide. We want guaranteed security from ES that information in our Management Plan will remain confidential.
420.6	JACK Wallace	Appendix N	Oppose	Delete.
421.6	JAMES S T & K A Family Trust	Appendix N	Oppose	Have no farm management plan required and implement good farming practices instead.
424.8	JARVIS Ben	Appendix N	Oppose	No specific decision requested.
425.8	Jedburgh Station Ltd	Appendix N	Oppose	<p>All aspects of the Farm Environment Plan to be negotiated before completion and submission of such Plan.</p> <p>Farm Environment Plan should be for at least 20 years’ duration subject to review every 3 to 5 years (not annually).</p> <p>Review and approval of my farm environment plan by Environment Southland would be infinitely better than both a farm plan and resource consents. A farm plan well done, signed off by Environment Southland would be preferable. This plan should be developed over time, may take 2 to 3 years to be developed initially. Farm plan must be as simple as possible to complete, also clear and concise.</p> <p>Environment Southland to provide certain requested information such as physiographic maps at farm scale with areas e.g. significant biodiversity etc. included/defined.</p>

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				This plan should be coordinated with the start of the new financial year for each farm; this is when farm plans are developed for the ensuing year e.g. my year starts on 1 <sup>st</sup> July with the end of the financial year being 30 <sup>th</sup> June. The dates to be negotiated by Environment Southland with the farmer in conjunction with the farm plan as it is being developed.
429.7	JOYCE Nathan J & Julie L	Appendix N	Support Oppose	I support the following: completing a simple, annual farm management plan. I do not support nutrient budget for sheep and beef farmers and must follow farm financial year: 1 July – 31st June. ES need to state how much a consent will be. We suggest no cost but a penalty system when a direct breach is made on water quality.
432.3	KANE Rex	Appendix N	Support	More work is needed to remove the possibility of different interpretations.
433.12	Kapuka Dairies Ltd	Appendix N	Amend	This rule could be amended from updated annually to updated every three years.
437.25	KEMPTHORNE Robert	Appendix N	Oppose in part	Amend, simplify, focus on results and above all keep it simple. Allow farmers to do their own Overseer budgets.
438.9	KENNEDY John	Appendix N	Oppose	A management plan must be as simple as possible to enable it to be enacted easily. The more information in it the less it will be looked at however a plain management plan which has all of the <u>main</u> criteria for reducing harm to the receiving waterways will be the most effective with the main points that correspond to the physiographic zone included. Once a management plan has been enacted a full refund of the Dairy Differential Rate must be given for every year that a management plan is in place.
440.4	KENT Rita	Appendix N	Oppose	ES need to provide a good template for farmers requesting exact information required. Not make this onerous for farmers to complete. Information required needs to be readily available to farmers to obtain and not require a professional at additional cost. Advise if Effluent Nutrient plan requires more detailed information than Fertiliser companies are providing. Not restrict the plan to an Annual Review. If good practices in place Bi-annual may be appropriate, effectively reducing compliance costs.
441.2	KIDD Hamish & Fiona	Appendix N		Remove requirement for nutrient budget (Overseer).
444.7	KING Henry	Appendix N	Amend	Extend the time frame and consideration of cost of Overseer. Needs to be subsidised.
445.3	KING R M & M J	Appendix N		I agree with each farmer having individual FMPs. I think it will create dialogue among farmers around farm practices but costs should be reduced. FMP replacing consents for different activities. Environment Southland having information available for individual farmers to use for their FMPs.
446.5	KINGSBURY Grant	Appendix N	Support part	Management plan signed off less often rather than applying for multiple resource consents.

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451.13	Knockinnon Farm Trust	Appendix N	Amend	Clarity on how farm plans are to be managed, the auditing process and time period between audits and amend date to, for example, 30 <sup>th</sup> May 2018.
453.6	KNOWLER Rohan	Appendix N	Support	Once a plan is submitted it will be signed off for a reasonable amount of time i.e. 10 years, and resource consent will not have to be obtained for fencing, winter grazing and drainage.
458.4	L R & S J Hammond Ltd	Appendix N	Support	Support doing the farm plans but they need to be easy to fill in and economically viable for farmers. Good industry scheme that all can understand. Clarify who audits them and who pays?
459.5	Lagore Enterprises Trust	Appendix N	Oppose	Put in place template detailing all relevant information required. ES need to ensure this is a good robust plan. (What constitutes a good plan?) Do not impose any unnecessary costs back to the farmer which may involve professionals to prepare on behalf of the farmers. Expectation of the Nutrient plan-is this to be more detailed than what the fertiliser companies are already producing for clients? Ensure that information to be collected is achievable with the majority of farmers already have the ability to access information required. Not to limit the GMP to be reviewed annually. If there are no significant changes then two yearly review may be more appropriate.
463.5	LAMB Greg	Appendix N		Reduce complexity and cost.
464.34	Landpro Ltd	Appendix N	Support in part	Removal of the word 'range' from point 5(vi)
469.8	LEGG Rob & Nessa	Appendix N	Oppose	There needs to be much more clear instructions and most importantly an easy to follow template if farmers are expected to be able to write this sort of Plan. It is extensive. Farmers should be able to fill in a template with their information in a user friendly way, again minimising time and avoiding unnecessary cost. As it stands there is no template available and most farmers would have to employ a consultant to write the plan on their behalf-this is unreasonable and pointless. If you want farmers to write a true plan then you have to provide them with the tool (template) to do so, someone else writing a plan for a farmer is an exercise and will not produce any environmental gain.
478.24	LOVERIDGE David	Appendix N	Support Amend	Needs some clarity on audit process, period between audits.
480.9	Lowburn Ag Ltd (Jonathan Pemberton)	Appendix N	Support	Retain.
482.24	Lower Aparima Catchment Group	Appendix N		We support management plans in accordance with Appendix N to be supplied to ES in lieu of consents.
483.22	Ludell Ltd	Appendix N	Oppose	ES work with farmers to accumulate templates and tools for management plans that do not require annual fees. ES should take into account that dairy farmers already comply with the

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				majority of these requirements and have independent inspections that cost us nothing annually.
487.7	M K H Farming Ltd	Appendix N	Amend	Amend to Appendix, to supply details of how this information will be kept secure and confidential.
488.5	MACDONALD Brian	Appendix N	Oppose	Clarify who pays for farm environment plans.
494.5	MACKINTOSH Alistair	Appendix N	Oppose	Remove Management Plan requirement for sheep farmers.
496.6	MACPHERSON Chanelle	Appendix N	Oppose	No specific decision requested.
497.2	Mainland Minerals Southern Ltd	Appendix N	Oppose	<p>We oppose – The use of OVERSEER to prepare the nutrient budget</p> <ul style="list-style-type: none"> <li>- That fertilizer companies will be expected to prepare nutrient budgets using OVERSEER.</li> </ul> <p>The alternative we propose</p> <ul style="list-style-type: none"> <li>- We suggest farmland should be split further into two zones using a simple set of criteria to establish if the farming operation has significant nutrient inputs or outputs as follows <ol style="list-style-type: none"> <li>1. EXTENSIVE zone would be where there are minimal nutrient inputs and outputs, other than fertilizer, such as sheep and beef pastoral paddocks. For this zone you would utilize the physiographic zones plus the soil characteristics, particularly the CEC (to determine annual limit of N application eg. <math>CEC \times 7 =</math> maximum N input per year and <math>CEC \times 2 =</math> maximum N input per any single application) and ASC (to determine annual limit to P application eg. ASC figure = maximum P input per year). The ASC and CEC are easy to establish with a soil test through any reputable NZ Lab (hills, Eurofins or ARL). ES would then have the ability to monitor and modify the multiple of the CEC and ASC for setting limits of N and P, respectively to farms in this criteria.</li> <li>2. INTENSIVE zone would be where there are significant nutrient inputs and outputs, other than fertilizer, such as dairy grazing, dairy effluent etc. If the set of criteria showed the farmland to be intensive due to significant nutrient inputs or outputs, then using OVERSEER to set limits and monitor would apply.</li> </ol> </li> <li>- The farmer is required to keep records of all nutrient inputs and produce them for ES upon request.</li> </ul>

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				<ul style="list-style-type: none"> <li>- Overseer reports could be produced by an independent body, such as ES having a trained team or using an independent consulting company such as AsureQuality (already trained at doing Dairy Farm checks).</li> <li>- The above staff would be certified in OVERSEER, and if every farm reports were done by the same team it will help ensure consistency of output results.</li> </ul>
504.5	MARSHALL Lynette	Appendix N	Amend	Once yearly is far too often. Perhaps every 2-3 would be more efficient and if there was a significant change to farming practice then updates could be made as needed.
508.4	Martyn Farming Ltd	Appendix N	Oppose	No specific decision requested.
515.8	MCCROSTIE Ray	Appendix N	Amend	Amend this rule to require a simple but farmer-focussed document, which only contains relevant information - a legal description is hardly necessary nor is another print out of the resource consent conditions (especially when this must already be displayed etc.). This plan should be reviewed 3-yearly, not yearly as stated.
518.13	MCDONALD Stuart & HALDER Robyn	Appendix N		Farm Management Plans. We would submit that these documents are filed free of charge.
520.7	MCELLIGOTT J W & T L	Appendix N	Oppose Amend	We need more time to get this implemented.
521.7	MCEWAN Trevor & Anthea	Appendix N	Amend	As an alternative I propose ES could review and approve our FEP instead of having to have both the Plan and resource consents.
524.5	MCINTYRE Craig & Rebecca	Appendix N		I support having a farm environment plan but do not support the complicated formats. Remove requirement to provide a cultivation map and intensive winter grazing map.
525.6	MCINTYRE Hayden	Appendix N	Oppose	No specific decision requested.
526.6	MCINTYRE Peter	Appendix N	Support Amend	That an effective farm management plan that actively seeks to address sediment, and nutrient loss risks from farm activities is the preferred option rather than consents. This option allows flexibility in dealing with these risk on a case by case basis. Allows flexibility and innovation in managing risks, customisable to the situation.
532.4	MCKEE M & C Family Partnership	Appendix N	Amend	Clarify what degree of confidentiality will there be for farmers?
535.6	MCKEE Tyler	Appendix N	Oppose	Delete.

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537.8	MCKENZIE G & T Partnership	Appendix N	Oppose	Delete Management Plan requirements.
538.8	MCKENZIE Hayden	Appendix N	Support Amend	<ul style="list-style-type: none"> <li>I believe a nutrient budget should be in place if you fall into a category of high nutrient use i.e. X amount of tonnes/Ha.</li> <li>It should be done as an upon request document or if a problem occurs. There should be a 3 month window or leeway dependent on time of year, for the farmer to be able to supply this to Environment Southland. Help with the cost of this should also be considered depending on the reason for request.</li> <li>Environment Southland should supply a basic template to make it as simple as possible for farmers to complete.</li> <li>Environment Southland should run training workshops/seminar on how to complete this as well as having a helpline/assistance if needed for farmers to complete their farm management plans for the first 5 years until they are familiar with the process.</li> </ul>
547.14	MCMULLEN G F	Appendix N	Support	Support using this to identify environmental gains etc as long as its simple and a lot of consents are not required.
547.15	McMullen G F	Appendix N	Support	Support as long as it is simple and prevents the need for multiple consents.
551.4	MCPHAIL Glen	Appendix N	Amend	Ensure that when preparing the management plan something can be done by the farmer if they desire to save costs.
552.5	MCPHAIL Neil	Appendix N		I agree that farmers should have management plans but not as a consent process to farm. Having the plans for their farms will give a better understanding of what each individual farm is trying to achieve and also how to improve their farming practices. These plans should be done by the farmer and maybe requested by the council if required for intensification within their farming operation.
553.13	McPhelzo Trust (C G & M P Pullar)	Appendix N	Support in part	<p>Retain use of farm environment plans.</p> <p>Retain review of plans each year.</p> <p>Amend provisions in Plan so that Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.</p>
554.14	McPhelzo Trust (Z, E & P Pullar)	Appendix N	Support in part	<p>Retain use of farm environment plans. Retain review of plans each year.</p> <p>Amend provisions in Plan so that Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.</p>
555.16	MCRAE Daryl & Ruth	Appendix N	Amend	Management Plan requirements: We want plans to be as simple as possible.



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				<p>Timing of 1<sup>st</sup> June doesn't work in with our year, could be 1<sup>st</sup> July to tie in with the new financial year.</p> <p>Nutrient budget constraints need to be recognised – these include budget factors that are unknown at the time of review such as lambing percentages and lamb prices for the coming season which can have an impact on planned nutrient budgets.</p> <p>We don't believe there should be a difference for under 100ha, we are all equally responsible for our environment.</p> <p>We don't want to have to do a farm plan and also have to apply for multiple resource consents, such as for cultivating slopes over 20 degrees. Plans should be reviewed and approved instead of having to apply for resource consents as well. We don't want Farm Environment Plans to result in increased costs to produce a compliant plan.</p>
557.12	MCRAE Matt	Appendix N	Oppose	Only require management plans for the small percentage of farmers that are non-complying or repeat offenders. Education is key. Or as a minimum reduce the frequency to once every five years.
558.15	MCRAE Natalie	Appendix N	Oppose	Remove the requirement for all farms over 20ha to produce a management plan annually. ES to undertake significant research into benefits of farm management plans before requiring them. Research to include costs associated with implementing and monitoring these plans. This will allow the ratepayers to make better informed decisions. As a minimum, remove frequency to every five years.
560.14	MCRAE Tim & Justine	Appendix N	Amend	These management plans need to be able to be filled out easily by farmers so that they have more ownership and accountability. This along with farmers implementing good management practices will have a greater uptake and by in by the farming community.
564.18	Mid-Aparima Catchment Group	Appendix N	Support Amend	We support these requirements in principle unless previously stated, but recommend that more detail around the "Environment Southland Register of Independently Audited Self-Management Participants" needs to be included in the Plan.
567.3	MILLER Geoffrey	Appendix N	Oppose	Not in favour of Farm Management Plan.
569.17	MILLER R J Trust	Appendix N	Oppose in part	We seek that Council amend the rule to request copies of management plans within set timeframes i.e. between May and August every second year. We also seek security from ES of the privacy of information within a management plan and also justify their estimated consenting cost, as outlined in the Section 32 report.
570.22	MILLER R L & S J Farm Trust	Appendix N		<p>Review the management plan requirements, are they really all necessary? Delete the requirement for drainage system maps, location of riparian vegetation and location of heritage sites.</p> <p>Change the nutrient budget to be a separate document that IS updated annually. In the PSWLP,</p>

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				implement Good Management Practices BEFORE requiring a Management Plan to be prepared. Add a paragraph stating that the information within the Management Plan remains the property of the farmer.
575.2	MITCHELL Keith	Appendix N	Amend	Appendix N(4)(a)(i) - Change “material change” to a significant or fundamental change.  Appendix N(B)(4)(a) - Add criteria that will be approved and how to go about getting approval for an alternative model.
576.6	MOIR Joseph	Appendix N	Oppose	Introduce and educate farmers on best management practices, but get rid of this management plan that needs to be submitted and updated yearly, it creates extra work, stress and cost for farmers that is not warranted.
578.7	Moonlight Trust	Appendix N	Oppose	I would like appendix N to be removed. I would like to see the Land Sustainability Team visit every farm in Southland for a day every 2 years.
579.3	MOORE James	Appendix	Support	Retain but: <ul style="list-style-type: none"> <li>• Make the plan as simple as possible to complete</li> <li>• No submission costs.</li> </ul>
583.28	MOSEBY Ryan	Appendix N	Amend	ES to provide a simplified version of Management Plan in template form to standardise the requirements. Clarification on auditing procedure – depth & timing.
590.18	Mt Linton Station		Support	Retain Appendix N – Part A 1, 2.  Appendix N – Part B 1: Should not have to be updated every year, only when land use change occurs or once every four years.  Appendix N – Part B 3: Should not be necessary to map depth of tiles.  Appendix N – Part B 4(iii): An annual review should not have to occur on input data. It is generally accepted that every four years is ample unless there is a change in farming system.  Appendix N – Part B 5(a)(vi): Delete ‘range of good management practice will be implemented each year’ or add ‘where possible’ as this needs to relate to priorities of work and finances available.

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				<p>Appendix N – Part B 6: Riparian management plan should be part of the farm plan, not separate, and this should be a recommendation not a compulsory plan. Disagree with the inclusion of type of vegetation and how it will be maintained, should not have to be included. Uptake of good management practice and preferred management should come through education and field days.</p> <p>Appendix N – Part B 7: Should not have to do a cultivation map. Instead it should come under best management practises what will be done to mitigate sediment runoff under cultivation. Farmers should not have to include information of 7(a)(i-iii).</p> <p>Appendix N – Part B 8: This should also come under best management practices. Farmers should not have to include the information 8(b) in management plans for council.</p> <p>Appendix N(6): Should not be compulsory to have a riparian management plan, recommend it instead.</p>
592.7	Mt Peel Ltd	Appendix N	Amend	As an alternative I propose – we work with environment southland to make a farm environment plan. If farming practices do not change stick with the status quo.
594.1	MUNRO Ronald & Kathryn	Appendix N Part B 1	Amend	That reporting on Farm Management Plans be an optional time frame from 1 to 3 years.
596.3	My Farm Ltd & Associated Farms & Kerr Road Dairy Ltd	Appendix N	Amend	Amend Appendix N so there is no need to submit data already held by ES e.g. information in resource consents and physiographic data.
603.20	Nithdale Station	Appendix N		Add the word “known” in reference to subsurface drains(8(6)(vi)).
615.5	O’CONNELL Dennis	Appendix N	Oppose	No specific decision requested.
616.10	O’CONNELL Elizabeth	Appendix N	Oppose	That a Management Plan is not a requirement of day to day farming but for a significant change of farming system. That ES set reasonable expectations around good farming practices and educate towards water quality with use of actual water quality readings.
619.5	Opio Milk Ltd	Appendix N	Support	We support in principle the management plans except where stated previously. We would like the information within these plans to be submitted to council to eliminate the need for consents where farms are operating in accordance with best practice.

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621.6	Otara Dairies Ltd	Appendix N	Oppose	We are not opposed to a management plan that will result in better environmental outcomes from farming activities, but it needs to be able to be prepared, understood and taken ownership of by the farmer. Any practices need to focus on GMPs, going further than GMP would result in a risk to or business.
623.7	P H Bennett Ltd	Appendix N	Oppose	Amend this rule because you are requiring all farmers to produce a new Management plan every year. This is unrealistic. Once we have a management plan and your farming practices are not changing each year then the original plan should suffice other than the odd amendment each year. Producing a new plan each year is costly and time consuming.
624.5	Paraemara Ltd	Farm Management Plan	Amend	This is an OK idea but needs to be very simple and cost free plan. Yearly for nutrient budget but updates done if anything changes. I oppose it if it is used in an oppressive way against the farmer i.e. nitrogen limits if the farmer really needs it. Simple plan, easy to use and fill out. Not be imposed to the detriment of the farmer. Must not be used as a tool to stop the farmer running his business in the best way possible for his farm to function properly.
629.2	PATERSON Tony	Appendix N	Oppose Amend	Amend the intensive grazing period to 1 June to 30 August.
634.4	PETER Hayden Trust	Appendix N		Clarify the difference between Farm Environment Plan and Farm Focus Activity Plan.
634.5	PETER Hayden Trust	Appendix N		Suggest all paddock testing and applying different nutrient mixes as required.
640.54	Pourakino Catchment Group	Appendix N	Support in part	Retain management plan approach and use of Appendix N.  Appendix N – section 10: Add word ‘water’.  Clarify Appendix N – section 9: (b) Records of the application, separation distance, depth, uniformity and intensity of dairy effluent disposal, in accordance with (e)(ii) above are kept and provided to the Southland Regional Council.
642.9	PREBBLE Lynden	Appendix N	Oppose Amend	As an alternative I propose ES could review and approve the farm plan instead of having to go through the resource consent process multiple times. A three yearly review would be adequate as most things identified in the plan to work on will be medium term projects requiring several years to complete.
643.9	PREBBLE Sandra	Appendix N	Oppose Amend	As an alternative I propose ES could review and approve the farm plan instead of having to go through the resource consent process multiple times. A three yearly review would be adequate as most things identified in the plan to work on will be medium term projects requiring several

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				years to complete. Keep the farm plan as simple as possible. Make sure information required for the farm plan isn't difficult or expensive to obtain.
647.14	Progressive Engineering Southland Ltd	Appendix N	Support in part	Retain management plan approach and use of Appendix N.  Section 9(b) of Appendix N – reference to (e)(ii), correct reference.  Section 9(b) – Add word 'annually'.  Section 10 – Add word 'water.'
650.6	PULLAR I J & K M	Appendix N	Oppose	Remove as requirement.
652.10	PULLAR Mary	Appendix N	Oppose	Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.
659.6	Rathfriland Ltd	Appendix N	Oppose	Delete.
661.43	Ravensdown Ltd	Appendix N	Support in part	Ravensdown seeks that Appendix N Part B4 is amended as follows:  <del>(a) A nutrient budget based on including soil nutrient tests has information shall be prepared once every 3 years been prepared, by a Certified Nutrient Management Advisor, using the latest version of the OVERSEER model, in accordance with the latest version of the OVERSEER Best Practice Data Input Standards, or an equivalent model approved by the Chief Executive of Southland Regional Council; except that:</del>  (i) where a material change in the land use associated with the farming activity occurs (being a change exceeding that resulting from normal crop rotations or variations in climatic or market conditions) the nutrient budget shall be prepared at the end of the year in which the change occurs, and also three years after the change occurs.  <del>(ii) where a material change in the land use associated with the farming activity does not occur, the nutrient budget shall be prepared once every three years;</del>  <del>(b) an annual review of the input data used to prepare the nutrient budget shall be carried out by or on behalf of the landowner for the purposes of ensuring the nutrient budget accurately reflects the farming system. A record of the review shall be kept by the landowner.</del>  Ravensdown seeks for the intent of Part B 5 to be retained, with the following amendments:

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				<ul style="list-style-type: none"> <li>• Delete Clauses (ii) and (iv); Incorporate Part B6 to 10 (Riparian Management, Cultivation, Intensive Winter Grazing, Collected Agricultural Effluent and irrigation Management) into the Good Management Practices section;</li> <li>• Require for consistency an indication that the on-farm good management practices undertaken in the previous 12 month period will need to be submitted to council on an annual basis;</li> </ul> <p>Include recognition in the Glossary, that Good Management Practice means “Industry Agreed Good Management Practices”, Sept 2015, developed by the primary industry sector groups in conjunction with Canterbury Regional Council.</p> <p>Ravensdown seeks for Part B6 of Appendix N to be retained, while amending it to incorporate Part B 5 – Good Management Practices.</p> <p>Ravensdown seeks for Part B7 of Appendix N to be retained, while amending it to incorporate Part B 5 – Good Management Practices.</p> <p>Ravensdown seeks for Part B8 of Appendix N to be retained, while amending it to incorporate Part B 5 – Good Management Practices.</p> <p>Ravensdown seeks for Part B9 of Appendix N to be retained, while amending to read “Collected <del>Agricultural</del> <u>Animal</u> Effluent” and amending it to incorporate into Part B5 – Good Management Practices.</p> <p>Ravensdown seeks for an amendment to Part A and B of Appendix N to refer to <u>Farm</u> Management Plans.</p>
666.28	Rimu Grasslands Ltd & Leicester Downs Ltd	Appendix N	Support	Retain but clarify whether this means our Focused Farm Plan is irrelevant and will need rewritten.
667.11	Riverfield Farms Ltd	Appendix N	Support Amend	Farmers are allowed to change paddocks prior to cultivation upon an amendment to Appendix N with the reasons; new area and paddock changes.
668.8	Rivervale Dairies Ltd	Appendix N	Support	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.

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673.3	ROBERTSON Colin	Appendix N	Oppose	Remove and trust the farmer that they will obey the rules set out.
684.6	ROSE David	Appendix N	Support	Retain Good management practices (GMP). Amend so nutrient budgets aren't compulsory. Simplify mapping requirements. Simplify content of management plan so GMP are the key element – remove requirement to map tile drains, clarify how heritage sites improve water quality. Delete any strict auditing regime.
686.3	Rosehill South Ltd	Appendix N	Oppose Amend	Will we be compensated for the cost of creating a management plan.  Remove the requirement for a cultivation map.
686.4	Rosehill South Ltd	Appendix N	Oppose Amend	
690.8	ROSS Warren	Appendix N	Amend	Further detail as to the parameters and flexibility as to the nutrient budget programme used.
691.8	Rossland Farming Ltd	Appendix N	Amend	Further detail as to the parameters and flexibility as to the nutrient budget programme used.
692.11	ROWE Emma	Appendix N	Oppose	The idea that these should be done by farmers will lead to inaccurate results. NMPs and NBs should be done by sustainable nutrient management advisors only. This is because the information that can be produced from overseer can easily be manipulated to suit the desired outcome. As it is an input based system it uses the inputs you enter then calculates the amount of pasture you are growing and then produces nutrient outputs from this. It is very touchy and the way in which things are entered are changing all the time. It is easy to download Overseer on line and there is a real risk that farmers will do this and make decisions based on what they think is correct, and giving out leaching numbers which are not indicative of what's going on on farm.
694.7	ROY Bruce	Appendix N	Support Amend	Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.
695.7	ROY James	Appendix N	Support in part Amend	I support using farm environment plans – a Farm Plan can help me to identify environmental gains that are appropriate for my property and I think reviewing my plan each year is a good idea but as an alternative I propose Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.
696.5	RUDDENKLAU I & J	Appendix N	Amend	Once developed the plan should remain active unless there is a change of land use.  Simplify the management plan so it is easier to develop and so will be less expensive.

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				Undeveloped gullies allowed as alternative to riparian areas.
704.6	Ryan Farms 2006 Ltd	Appendix N	Support	Retain Appendix N but we would like information within these plans to be submitted to council to reduce need for consents if these plans show that individual farms are operating in accordance with best practice.
709.4	SCHMIDT D	Appendix N	Oppose	Clarify what cost, who is going to read and monitor and what effects on rates & compliance costs. Delete Riparian Plan
712.36	Seaview Trust & Oraka Farms Ltd	Appendix N	Support	Support the requirement for farm management plans. These plans need to be able to be undertaken by the farmer and not consultants. Farm plans should only need updated to a minimum level when changes occur and should be treated as living documents rather than updated yearly.
716.8	SHALLARD Mark & Tania	Appendix N	Oppose Amend	Amend farm plan to be simple to complete.
718.13	Shallow Croft Ltd	Appendix N	Oppose Amend	Amend to replicate Otago's approach to water quality.
724.5	SHIRLEY Wayne & Gaye	Appendix N	Oppose	Environment Southland should be accountable for the regrowth of weeds in fenced areas or farmers reimbursed for cost of spraying etc.
728.7	Slope Point Farms Ltd	Appendix N	Amend	We propose that once a plan is underway, that no consents or major review need to be done unless you are significantly changing your farming practice. If you insist of doing an annual review, then allow for the farmers like us who have a steady ratio of stock and consistent farming practice – exemption from annual review.
730.12	SMALLEY Timothy	Appendix N	Oppose	We oppose this due to not enough professional help trained or available to help draw up plans required.
731.11	SMITH Barry	Appendix N		Appendix N Part B (3): Insert missing word in the point referring to subsurface drainage and advertise for resubmission.
732.7	SMITH George & Kathryn	Appendix N		Should our General relief not be accepted, we submit that if farming is a permitted activity it should not require an environment plan. People will not want to farm with so many consents required. Plans are too frequent and become a yearly cost.
733.18	SMITH Hamish & Karen	Appendix N	Support	Appendix N B(6): Ensure council is sensitive to this burden on the farmer. We ask that rather than imposing fines and punishments, Environment Southland would advise and assist farmers in this endeavour.



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735.4	SMITH William	Appendix N		Make simpler and take cost away from farmer.
737.33	Smithill Ltd	Appendix N	Support in part Amend	Section 10 should be amended to clarify that it related to water irrigation only. Smithill Ltd in general, supports the overall content within Appendix N. However, the cost of management plans annually is a concern.
738.6	Snowdon Downs	Appendix N	Oppose	Have no farm management plan required and implement good farming practices instead.
743.5	Southern Farms NZ Ltd (Brendon Phillips)	Appendix N	Amend	Critical Source Zones should only be fenced where and when practical. Farm management plans should be reviewed every three years.
744.5	Southern Farms NZ Ltd (Gene Bryce)	Appendix N	Amend	Plans should be for 5-10 years with annual reports/reviews for items that change annually, i.e. nutrient budget, cultivation, winter crops.  No farming activities that fall within best farm practice and standards should require resource consent.
745.3	Southern Farms NZ Ltd (Brendon Duthie)	Appendix N	Amend	Amend Appendix N to a more flexible plan which is submitted perhaps every two years for approval and the ability to change plans.
747.8	Southern Star Farms Ltd	Appendix N	Amend	Amend this rule to require a simple but farmer-focussed document, which only contains relevant information - a legal description is hardly necessary nor is another print out of the resource consent conditions (especially when this must already be displayed etc.). This plan should be reviewed 3-yearly, not yearly as stated.
752.189	Southland Fish & Game Council	Appendix N	Support Amend	Insert a schedule that sets out examples of what is good management practice.
752.190	Southland Fish & Game Council	Appendix N	Support Amend	Amend Table 1 to include all key transport pathways and contaminants for each physiographic zone as outlined in Council's science. And Amend section 7 – Cultivation (ii)(1) – (3) as follows: <b>“7. Cultivation</b> (a) A cultivation map showing: (i) waterbodies; (ii) buffer strips along those waterbodies as follows: (1) 3 5 m buffer <u>measured horizontally from the outside edge of the bed where</u>

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				<p>slopes are 4 degrees or less</p> <p>(2) 10 m buffer <u>measured horizontally from the outside edge of the bed</u> where slopes are greater than 4 degrees and up to 16 degrees</p> <p>(3) 20 m buffer <u>measured horizontally from the outside edge of the bed</u> where slopes are greater than 16 degrees</p> <p>(4) as specified in resource consent conditions where the slopes are greater than 20 degrees;</p> <p>Amend section 8 – Intensive Winter Grazing(b)(v) as follows: “(v) buffer strips <u>measured horizontally from the outside edge of the bed of the waterbody.</u>”</p>
757.7	Southwest Properties Ltd	Appendix N	Amend	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.
759.27	Springlands Group Ltd	Appendix N	Support in part	We seek that the word ‘range’ is removed from Point 5. Security from ES regarding the confidentiality of this information.
761.18	STALKER Hanna & Callum	Appendix N	Support	Retain.
771.15	STEWART Family Trust (Trevor Stewart)	Appendix N	Amend	Make the farm plan as simple as possible for me to complete.
773.10	STEWART Rory	Appendix N	Oppose	Get rid of Appendix N; bring in good farming guidelines that need to be followed.
774.8	STEWART Vanessa	Appendix N	Amend	Make the farm plan as simple as possible for me to complete.
775.9	Stoney Creek Station Ltd	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent for most aspects of this plan.
784.3	Sunnyside Station	Appendix N	Amend	One plan done and only needing resubmitting if there are changes to farming practices.
786.10	SUTHERLAND Kevin & Ann	Appendix N	Support Amend	Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.
790.13	TAIT G R & J E & Waikawa Valley Trust	Appendix N	Oppose	Costly and time consuming.
792.37	TAYLER Matthew	Appendix N	Support in part	<ul style="list-style-type: none"> <li>ES need to ensure management can be completed by the landowner without use of a</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>consultant.</p> <ul style="list-style-type: none"> <li>• If a plan is deemed substandard by ES, the farmer should be allowed to reassess and resubmit the plan, potentially with recourse to a consultant at this stage although it would be hoped ES staff would assist the landowner in the first instance.</li> <li>• A nutrient budget should only be required where new or expanded dairy farming or winter grazing occurs over a set threshold. Extend timeframes.</li> <li>• I believe ES's land sustainability officers will need to be properly resourced and more qualified staff added to assist farmers in the formulation of these plans. At a minimum ES should provide the maps required (physiological zones, location of rivers streams etc., heritage sites and indigenous biodiversity identified in district plans) free of charge and assist in understanding what GMP's they desire.</li> <li>• I do not believe OVERSEER is sufficiently developed to be used as envisaged – it is still being developed and many changes still forthcoming as new research is undertaken. I also doubt that there are enough suitably qualified people to undertake OVERSEER modelling as envisaged by the pSLWP.</li> </ul>
797.60	Te Runanga o Ngai Tahu	Appendix N	Support in part	<p>Add new clause:</p> <p><u>(vii) Information on what comprises Good Management Practice is reviewed and updated accordingly on a five yearly basis to ensure it is up to date with the latest farming technology and practices, as well as the latest environmental data.</u></p> <p>Add new Management Plan context as follows:</p> <p><u>Taonga Species and significant indigenous biodiversity Within the Management Plan provide a section which show how farming activities will be undertaken in a manner that minimises adverse effects on:</u></p> <ul style="list-style-type: none"> <li>• <u>taonga species in Appendix M.</u></li> <li>• surface waterbody,</li> <li>• <u>natural wetland,</u></li> <li>• <u>riparian area, and</u></li> </ul> <p><u>significant indigenous biodiversity.</u></p>
798.12	TEMPLETON Luke	Appendix N	Support in part Amend	<p>I support management plans in accordance with appendix N to be supplied to ES in lieu of consents. But provide clarity on;</p> <ul style="list-style-type: none"> <li>• how the Farm Plans are to be managed?</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<ul style="list-style-type: none"> <li>the audit process</li> <li>time period between audits</li> </ul> <p>More detail is required around the “Environment Southland Register of Independently Audited Self-Management Participants” and needs to be included in the Plan.</p>
799.14	TEMPLETON Peter	Appendix N	Support in part Amend	<p>Provide clarity on;</p> <ul style="list-style-type: none"> <li>how the Farm Plans are to be managed?</li> <li>the audit process</li> <li>time period between audits</li> </ul> <p>More detail is required around the "Environment Southland Register of Independently Audited Self-Management Participants" and needs to be included in the Plan.</p>
802.37	The 254 Partnership & Gerken Family Trust	Appendix N	Support Amend	<p>Remove all clauses under Appendix N, except for #5. Only Good Management practices should be included. If Farm Management Plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management. ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.</p>
803.43	The Fertiliser Association of NZ	Appendix N Pages 198 to 202	Support in part. Amend.	<p>Amend Part B – Management Plan Content as follows:</p> <p>3. A map(s) or aerial photograph(s) at a scale that clearly shows:</p> <p>....</p> <ul style="list-style-type: none"> <li>where known, the <u>location</u> of any subsurface drainage system(s) and relative depth and position , including the outlet(s) of any such systems;</li> </ul> <p>Amend Appendix N – 4 Nutrient Budget as follows:</p> <p>(a) A nutrient budget based on soil nutrient tests has been prepared <u>by a Certified Nutrient Management Advisor</u>, using the latest version of the OVERSEER model, in accordance with the latest version of the OVERSEER Best Practice Data Input Standards, or an equivalent model approved by the Chief Executive of Southland Regional Council:</p> <p>.....</p>
803.44	The Fertiliser Association of NZ	Appendix N	Support in part. Amend.	<p>Amend Appendix N Management Plan Requirements as follows:</p> <p>(a) A good management practices section which identifies:</p> <p>(i) the general good management practices which will be undertaken on farm over the coming 1</p>

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				<p>June to 31 May period. Examples of general good management practices are provided on the Southland Regional Council website.</p> <p><del>(ii) the physiographic zones, and variants (where applicable) within the property;</del></p> <p>(iii) the key transport pathways and contaminants (where applicable) for each of the physiographic zones within the property, from Table 1 below;</p> <p>(iv) the good management practices for any relevant key transport pathways which will be undertaken on farm over the coming 1 June to 31 May period. A list of example actions to consider for each of the mitigations is provided on the Southland Regional Council website;</p> <p>(v) upon 12 monthly review, the good management practices that were undertaken in the previous 1 June to 31 May period and the good management practices to be implemented over the coming 1 June to 31 May period;</p> <p><del>(vi) a range of good management practices will be implemented each year.</del></p> <p>vi) <u>Good management practices specific to intensive winter grazing:</u></p> <p><u>(i) to minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land for intensive winter grazing;</u></p> <p><u>(ii) to avoid the conspicuous discolouration or sedimentation of any adjacent waterbodies;</u></p> <p><u>(vi) in relation to sheep, the good management practices to manage critical source areas to ensure contaminant losses, particularly associated with overland flow, are minimised.</u></p> <p>Amend Appendix N Riparian Management Plan as follows:</p> <p><b>6 Riparian Management Plan</b></p> <p>(a) A Riparian Management Plan is prepared and implemented, and records in written and/or map form:</p> <p>(i) methods to exclude stock, where required, from waterbodies, critical source areas and riparian areas;</p> <p><del>(ii) in relation to sheep, the mitigation measures to manage critical source areas to ensure contaminant losses, particularly associated with overland flow, are minimised. ....</del></p> <p>Retain Appendix N Intensive Winter Grazing as notified, provided unnecessary duplication of</p>

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				information and complexity in the Farm Management Plan is avoided.
804.2	The Mahoe Trust	Appendix N	Amend	Farm Management Plans should have a one year period to complete and be updated every two years.
807.9	The Terraces Ltd	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent on most aspects of this plan.
808.5	THOMAS Alison & Roger	Appendix N	Support	Retain.
810.53	Three Rivers Catchment Group (TRCG)	Appendix N	Support	Retain management plan approach and use of Appendix N.  BUT Amend as follows:  Section 9: (b) Records of the application, separation distance, depth, uniformity and intensity of dairy effluent disposal, <del>in accordance with (c)(ii) above,</del> are kept and provided to the Southland Regional Council.  Section 10: Add word 'water'.
813.11	Tihaka Farms	Appendix N	Amend	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.
814.10	Timothy Farms Ltd	Appendix N		We suggest ES allows farmers to create their own management plan using a set of ES formulated criteria that is able to be easily understood and executed in a reasonably quick timeframe by farmers themselves.
822.8	Tremaine Farming Partnership	Appendix N		Prepare a mock management plan so landowners can see what is involved in preparing them.
824.9	Tulloch Farm Glendhu Ltd	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent on most aspects of this plan. The timeframe for completion extended to 2025.
825.10	Tulloch McNab Transport Ltd	Appendix N	Oppose	Management plans should be encouraged and not be compulsory. If the panel is not of a mind to accept this, the preparation of a management plan should remove the need to apply for a resource consent on most aspects of this plan. The timeframe for completion be extended to 2025.

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827.9	TURNER Paul & Kayleen	Appendix N	Support	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. We would be happy for these to be audited by either council or an industry body i.e. Fonterra.
828.9	Twin Farm Ltd	Appendix N	Oppose	<p>Farmers who have been identified as contributing to the decline in water/land quality should prepare a management plan in conjunction with Environment Southland so they can tailor the plan to mitigate problems.</p> <p>Define as a significant or fundamental change as stated in (4)(a)(i) And for equivalent models add criteria they will approve on and how you go about getting approval for an alternative model.</p>
830.7	Upper Aparima Catchment Group	Appendix N	Support	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.
831.7	VAN DER BIJL Willem	Appendix N	Oppose	Allow farm plan to be easily amended based on weather and economics
832.140	VAN GOOL Raewyn	Appendix N		The Plan should not be required to be updated yearly; it should be 3 yearly or 5 yearly where there have been no significant changes in farming practices. It should not be a requirement for a budget to be based on soil nutrient tests. A much better requirement would be not to have nutrient budgets prepared in advance as required in 4a, but to require a nutrient budget every 3 years to use inputs that actually occurred. Retain good management practices.
833.8	VAN ROOIJEN Marcel	Appendix N	Support	We support in principle the management plans except where stated previously. 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.
840.10	W & B Clarke & Son Ltd	Appendix N		<p>We believe Environment Southland should focus on education and culture change to generate improvement in good management practices rather than requiring a document to be submitted saying that a farmer will do something.</p> <p>We suggest that Environment Southlands Land Sustainability resource be invested in and increased to allow the Land Sustainability team to interact with farmers in a manner that is non regulatory rather than have rules requiring annual farm management plans; that then may not be followed on farm and require extensive monitoring by Environment Southland to ensure compliance.</p> <p>If the submission of these plans is to remain within the Plan at the very least we would like to</p>

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				suggest that these plans be done on at most a bi-annual basis and preferably Tri-annually, and that there is a mechanism for changes to be easily made if required or due to unforeseen circumstances that may arise over this time frame.
842.11	Waihoaka Holdings Ltd	Appendix N	Amend	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.
845.6	WALLACE Bruce & Maree	Appendix N	Amend	Needs flexibility. Timing extend deadline 31 Dec.
846.5	WALSH Brian	Appendix N	Oppose	Remove costs.
847.4	WALSH Kerri	Appendix N	Oppose	Oppose cost related to Farm environment plan.
854.6	WELLER Grant & Bernie	Appendix N	Support Oppose	Retain Farm Environment Plan. Delete mandatory need for every farmer to have an Overseer nutrient budget. Permitted activities - keep records available on request.
855.3	WELLS A R & J R Family Trust	Appendix N	Amend	Delete the requirement to update the Management Plan yearly and amend to 3-5 year Block Plan.
856.7	West Range Farms Ltd (Bronwyn Chamberlain)	Appendix N	Support	I agree in principle with the management plan except where stated elsewhere in this submission.
857.8	West Range Farms Ltd (Derek Chamberlain)	Appendix N	Support	I agree in principle with the management plan except where stated elsewhere in this submission.
863.7	Whiterig Dairy Farm	Appendix N	Neutral	Management plan to be completed by 31.12.16. This gives farmers time to complete calving and then consider the plan. Allow flexibility around cropping plans.
865.9	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Appendix N		Remove Part B(a)(iii). Remove Part B(a)(v) if it is not for Southland Regional Council maintenance. Part B 8(a) Include good management practices for (i) and (ii). Part B 8(b) (vi) only map known drains. As this will be a major undertaking I recommend that certain sections of this plan are required to be developed each year over the next three years.
866.7	WILKINS Brendan	Appendix N	Oppose	Review requirements of Management Plan and delay requirement for a Management Plan until Good Management Practice is independently scientifically proven to be ineffective in both maintaining and improving water quality.
868.35	Wilkins Farming Ltd	Appendix N	Oppose in part	Management plans only be required to submit to ES if there is a scientifically proven issue as a



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>result of a farming practise on a particular farm.</p> <p>The request of a management plan must be in writing to the farmer concerned with 20 working days' notice.</p> <p>Add a statement that the information within the management plan remains the property of the farmer.</p> <p>Review and reduce the management plan requires e.g. information already held by ES such as resource consents, Plus, delete drainage maps and heritage sites.</p> <p>Extend the need to review the management plan out to 5 yearly.</p> <p>Change the Nutrient budget to be a separate document that requires annual review.</p>
875.8	Willowbank Farms 2015 Ltd & Avondale Dairies	Appendix N	Support	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.
877.74	WILSON Aaron	Appendix N	Support in part	<p>Council need to outline privacy policies and ownership of information prior to GMPs becoming operative. It also needs to provide approved industry good FMPs to reduce duplication and reduce overall costs.</p> <p>A register or system with ES needs to be developed so early adopters are not unduly penalised in the limit setting process.</p> <p>Part B5(i) needs to be flexible to reflect the timing of seasonal work on farm.</p> <p>Part B5(a)(v) needs clarification around what form/shape the 12 month review will take, and by whom or who will be conducting it.</p> <p>The Water and Land Plan needs to outline who or whom will audit the FMP process and who will bear the associated auditing costs.</p> <p>Part B7 Cultivation needs to be defined as to whether it applies to all cultivation or just cultivation for winter crops.</p> <p>Part B8(i) needs to define whether the on/off grazing of crop in lactation is include in the intensive winter grazing rule.</p> <p>I support the establishment and use of FMPs as they should be the cornerstone of this Water and Land Plan and take precedence over a consenting regime.</p>
878.5	WILSON Douglas	Appendix N	Amend	<p>If required, they need to be basic in a simple practical form. As suggested they are on invasion of privacy and farm practice – complete overkill in detail. Remove requirement for a full plan annually. Nutrient Budget Reviews – Exclude sheep farming.</p> <p>Remove requirement to map existing drains and outlets.</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.79	WILSON Shannon	Appendix N	Support in part	<p>Council need to outline privacy policies and ownership of information prior to GMPs becoming operative. The W&amp;L plan needs to recognise the cost in time and money that is born by the farmer in creating FMPs. It also needs to provide approved industry good FMPs to reduce duplication and reduce overall costs.</p> <p>A register or system with E.S needs to be developed so early adopters are not unduly penalised in the limit setting process. Part B 5 (i) Needs to be flexible to reflect the timing of seasonal work on farm. Part B 5 (a)(v) needs clarification around what form/shape the 12 month review will take, and by whom or who will be conducting it.</p> <p>The W&amp;L plan needs to outline who or whom will audit the FMP process and who will bear the associated auditing costs. Part B 7. Cultivation needs to be defined as to whether it applies to all cultivation or just cultivation for winter crops. Part B 8 (i) needs to define whether the on /off grazing of crop in lactation is included in the intensive winter grazing rule.</p> <p>I support the establishment and use of FMPs as they should be the cornerstone of this W&amp;L plan and take precedence over a consenting regime.</p>
882.3	WING D R & H M	Appendix N	Amend	All references in Maps (3) and Winter Grazing (8)(a)(vi) to the location of any subsurface drainage system(s), their relative depth and position be deleted. The requirement to locate outlets remain.
883.5	WING Darren & Jenny	Appendix – N	Oppose Amend	Might be better having an end time of March so that the winter period is all in the same cycle. Make time frame 5 years.
892.7	YOUNG A R & R B Partnership (Andrew Young)	Appendix N	Amend	Environment Southland could review and approve environment plan every five years and required consents given at the same time.
893.8	YOUNG A R & R B Partnership (Roseanne Young)	Appendix N	Oppose Amend	Environment Southland could review and approve my Farm Environment Plan, instead of me having both a Farm Environment Plan and resource consents.

## Appendix O

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
47.28	Balfour, Wendonside & Waikaia Group	Appendix O		<p>Reference to Appendix O in surface water and groundwater abstraction Rules.</p> <p>We propose that reasonable irrigation volumes are assessed on a case by case basis to determine</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				efficient use for irrigation.
94.7	Brooklea Farm Ltd	Appendix O	Oppose Support	Support that current and existing consents under the RMA continue and are assess on a case by case basis when we come to renew our consent.
189.51	Dairy Holdings Ltd	Appendix O		Amend "Other uses" as follows: The rate and volume of abstraction for resource consent applications to take and use water for purposes other than irrigation, group or community water supply will be calculated in accordance with best management practices for efficient use of water in relation to that use; <u>and for stock and dairy shed use will be calculated in accordance with Table Y.3 in Appendix L.4.</u> Applications for replacement resource consents may also demonstrate by way of independent verification or audit that existing (and proposed) usage is in accordance with rates and volumes sought and does not result in wastage or inefficient use of water.
189.52	Dairy Holdings Ltd	Appendix O		Include a method for calculating the rate or take for replacement resource consents from over-allocated waterbodies. This method should be fair and equitable to existing users, and acknowledge the reality of existing farming operations (including those with existing consents that are yet to be implemented) and their reasonable water needs.
246.8	ENGLISH Hamish	Appendix O	Oppose	Appendix O (a): Allocation in water balance models based on 350 mls annum and nine in ten reliability.
258.30	Eyre Creek Ltd	Appendix O	Support in part	3000m3/ha/yr is an unreasonably low base and it should be more like 4500m3/ha/yr with potential to go up on a case by case basis which factors in all economic and environmental perspectives.
273.3	Flaxwood South	Appendix O	Amend	Appendix O(b): Ensure historical data used is greater/longer than four or five years.
279.125	Forest & Bird NZ	Appendix O	Support	Retain.
390.39	Horticulture NZ	Appendix O	Support in part Oppose in part	Amend Appendix O Irrigation a) Replace: 80 percent (4 in 5 year) reliability With: <i>90 percent (9 in 10 year) reliability.</i> AND Irrigation b) 2nd bullet point: Any proposed changes to the operation of the irrigation system or <i>farming system.</i>
414.14	Irrigation NZ Incorporated	Appendix O		(a)... by use of a field-validated <u>daily time-step</u> irrigation demand model to calculate the annual irrigation volume to achieve <del>80 percent (4 in 5 year)</del> <u>90 percent (9 in 10 year)</u> reliability which takes account of:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				... <ul style="list-style-type: none"> <li><u>an</u> irrigation application efficiency of 80%</li> </ul> Delete (b) and base all allocation on a field-validated daily irrigation demand water.
464.35	Landpro Ltd	Appendix O	Support Amend	Reference to Appendix O in surface water and groundwater abstraction Rules. We propose that reasonable irrigation volumes are assessed on a case by case basis to determine efficient use for irrigation, in relation to a 9 in 10-year reliability of supply.
569.18	MILLER R J Trust	Appendix O	Oppose	We propose that reasonable irrigation volumes are assessed on a case by case basis to determine efficient use of irrigation.  Take into account people's capital investment of irrigators and consents. Ours is over 1 million dollars, we cannot afford to be cut in the amount of water we can take. Consent holders must receive some sort of guarantee to be able to keep their consent allocations as this is what our budgets have been based on.
752.191	Southland Fish & Game Council	Appendix O	Support	Retain.
759.28	Springlands Group Ltd	Appendix O	Support Amend	Reference to Appendix O in surface water and groundwater abstraction Rules. We propose that reasonable irrigation volumes are assessed on a case by case basis to determine efficient use for irrigation.
850.3	WaterForce Southland	Appendix O	Amend	Irrigation can easily be controlled with a GMP. If Appendix O is to stay in place a quantity of 4000m3/ha/year will cover 9/10 seasons in most areas of Southland. Water abstraction for irrigation already requires consent appendix O (a) would be implemented as a GMP.
868.36	Wilkins Farming Ltd	Appendix O	Support in part	3000m3/ha/yr is an unreasonably low base and should be more like 4500m3/ha/yr with potential to go up on a case by case basis which factors all economic and environmental perspectives.

## Appendix P

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.36	Ardel Dairies Ltd	Appendix P	Oppose	Shorten timeframe to 24 hours, reword to cater for all pond types.
147.10	CLEMENT Karina	Appendix P	Oppose	No specific decision requested.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
189.53	Dairy Holdings Ltd	Appendix P		Amend Appendix P (6): <del>Ponds must be at or over 75% design depth before a test can be undertaken</del> <u>The depth of the pond is to be recorded for the drop test.</u>
191.15	DALE J M & K B	Appendix P	Oppose	Revise this to allow the person who performs the test to analyse the data.
192.17	DALE P T & S B Trust	Appendix P	Amend	Simplify.
247.33	Environment Southland	Appendix P	Amend	Amend the second bullet point of Appendix P to read: Testing recording equipment is to be accurate to <del>not more than</del> <u>0.8 mm or less.</u>
275.6	FLETT Alan	Appendix P	Amend	Amend to let engineer do data analysis.
314.11	Gladvale Farms Ltd	Appendix P	Oppose	The drop test conditions need to revert to old rules.
319.20	Glendhu Dairies Ltd	Appendix P	Oppose	Amend timings from 48 hours to 24 hours.
347.3	HAMILL Mark & Deborah	Appendix P	Oppose	A whole new methodology needs to be developed.
347.4	HAMILL Mark & Deborah	Appendix P	Oppose	If a consent is required, it must be in a form that can be completed by a farmer (perhaps tick box) without the need for specialist consultants etc. Consents should not be just another compliance cost but a way of farmers knowing their responsibilities.
356.1	Harvest Electronics	Appendix P		We submit that 12 hour overnight testing be permitted rather than requiring a 48 hour test. The methodology specified 10 second logging which just generate a huge amount of worthless data that has no relevance to the accuracy of the drop test. We prefer to do one minute logging which easily detects any sudden changes in effluent (addition and removal).
369.17	HENDERSON Michael	Appendix P	Oppose Amend	Provide a more practical method based on Southland's climatic and environmental conditions.
437.26	KEMPTHORNE Robert	Appendix P	Oppose in part	Amend the criteria to allow registered ag engineers the ability to carry out the test quicker and easier at different times of the year and with different operating systems.
440.5	KENT Rita	Appendix P	Oppose	If pond equipment installer is an independent certified technician they are qualified to accurately report results.
464.36	Landpro Ltd	Appendix P		We propose that a drop test plan is prepared by a suitably qualified person and submitted to ES 7 days prior to undertaking a drop test.
638.10	Pinnacle Farming Company Ltd	Appendix P	Amend	Amend to make simpler.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
663.7	RD Agritech Ltd	Appendix P	Amend	<p>Amend Appendix P to allow for approved alternative methodology for compliance testing in situations where isolation of the pond for 48 hours is not possible, and include a requirement for any measurement of inflows and/or outflows (where undertaken) to be within +/-5% accuracy.</p> <p>Also amend Appendix P to allow for some wind in excess of 10m/s, where it can be shown that any such wind events have not adversely affected the accuracy of level recording or the outcome of the test.</p> <p>Alternatively, the above matters may be satisfied by allowing in the relevant Plan Rules, (32 to 35) for approved alternative Pond Drop Test methodologies to that set out in Appendix P, provided that any such methodology is reviewed by a CPEng and agreed with the council.</p> <p>Any alternative methodology shall, as much as possible, follow Appendix P and any departure/s from Appendix P shall be detailed including the reason/s why the full Appendix P methodology is not suitable for the particular test.</p> <p>Approval of alternative methodologies shall be on a case-by-case basis and specific to each pond/structure being tested.</p>
666.29	Rimu Grasslands Ltd & Leicester Downs Ltd	Appendix P	Amend	This needs rewritten to be more practical.
752.192	Southland Fish & Game Council	Appendix P	Support	Retain.
789.2	SWNEY Garry & Beverley	Appendix P	Oppose	<p>Allow an exclusion to the “Drop Test” for certain effluent ponds e.g. PVC lined, inspection port, drainage channels.</p> <p>Reduce level from 75% of design depth before a test can be undertaken.</p> <p>Reduce or discontinue approval of clay lined ponds in Southland.</p> <p>Amend the requirements for testing to make them more appropriate.</p>
811.25	THYS Herman & STAUT Tinneke	Appendix P		<p>Include the following alternative:</p> <ul style="list-style-type: none"> <li>• Install inspection bores or sub surface/construction drains with inspection holes.</li> <li>• Yearly inspection and water testing from the sub surface drains.</li> </ul>
863.8	Whiterig Dairy Farm	Appendix P	Neutral	With the rules regarding wind will make it extremely limiting. 75% pond filled farmers never know what climatic conditions are ahead and often in any given season avoid having the pond

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				near its capacity.
877.75	WILSON Aaron	Appendix P	Oppose	Council need to find an agreed industry wide standard of measurement and test that can be performed in a timely and cost effective manner and which doesn't contravene GMPs.
879.7	WILSON Kerry	Appendix P	Oppose	No specific decision requested.
880.80	WILSON Shannon	Appendix P	Oppose	Council need to find an agreed industry wide standard of measurement and test that can be performed in a timely and cost effective manner which doesn't contravene GMPs.

## Appendix Q

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.112	BYTHELL Jesse	Appendix Q		Regarding Appendix Q – Sensitive Water Bodies, I seek this schedule be expanded to include the following water bodies: <ul style="list-style-type: none"> <li>• Waiau River lagoon</li> <li>• Jacobs River Estuary</li> <li>• Waikawa Estuary</li> <li>• Haldane Estuary</li> <li>• Toetoes (Mataura River) Estuary</li> <li>• Lake George</li> <li>• Lake Vincent</li> <li>• Lake Brunton</li> <li>• Lake Cook</li> </ul>
210.101	Director-General of Conservation	Appendix Q	Support in part.	Amend Appendix Q to include estuaries, all Lakes and wetlands in Te Wāhipounamu South West New Zealand World Heritage Area, the Lower Waiau River Arm of Lake Manapouri, all lakes, lagoons , estuaries and all wetlands (where surface water enters the wetland) as follows: See Director-General of Conservation Submission on Appendix A above.
247.34	Environment Southland	Appendix Q	Amend	Delete the text, 'Lakes in Milford Sound' from Appendix Q – Sensitive Waterbodies.
279.126	Forest & Bird NZ	Appendix Q	Support with amendments	Amend Appendix Q to include estuaries, all Lakes and wetlands in Te Wāhipounamu South West New Zealand World Heritage Area, the Lower Waiau River Arm of Lake Manapouri, Jacobs and New River Estuaries, and all lakes, lagoons, estuaries and wetlands (where surface water enters the wetland): See Forest and Bird Submission on Appendix A.
552.6	MCPHAIL Neil	Appendix Q		There needs to be clarification of a lake, I would suggest using Appendix Q to clarify what a

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				lake is.
666.30	Rimu Grasslands Ltd & Leicester Downs Ltd	Appendix Q	Oppose	Provide reasoning for why the Waimatuku Estuary has been included in Appendix Q.
752.193	Southland Fish & Game Council	Appendix Q	Support Amend	Amend Appendix Q to include all lakes, wetlands, lagoons and estuaries in Appendix A as set out in the submission of Fish & Game [see Fish & Game submission in Appendix A above].
811.26	THYS Herman & STAUT Tinneke	Appendix Q	Oppose	We propose to remove lagoons and estuaries from Appendix Q as they have totally different characteristics.

### New Appendix required

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
247.35	Environment Southland	New Appendix		Insert new Appendix L.7 as follows: <u>Appendix L.7</u> <u>The primary allocation for groundwater takes outside groundwater management zones listed in Appendix L.5 will be established as equal to 35 percent of the rainfall recharge occurring over the relevant land area where the water is to be taken.</u>
279.127	Forest & Bird NZ	New Appendix – Water Quality in Southland	Insert new appendix	Insert a new schedule identifying overallocated water bodies including estuaries and lagoons that do not meet the bottom lines in the NOF outlined in the NPS-FM; or the Revised Drinking-Water Standards for New Zealand.
372.35	Heritage NZ	New Appendix	Amend	Include as an Appendix to the Plan the HNZPTA 2014 legal requirement concerning archaeological sites – see submission for further details.
752.194	Southland Fish & Game Council	New Appendix		Insert a new schedule identifying, as a minimum, where surface water and groundwater quality in Southland has been degraded by land use and discharge activities to the point that: <ol style="list-style-type: none"> <li>1. Has not achieved a level commensurate with a 10% improvement in any water quality parameter with respect to 2010 monitoring data; or</li> <li>2. It does not meet the bottom lines in the NOF outlined in the NPS-FWM; or</li> </ol>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>3. The Drinking-Water Standards for New Zealand 2005 (revised 2008).</p> <p>In addition, include in the above schedule identification of where surface water quality does not meet the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000 Guidelines).</p>
752.195	Southland Fish & Game Council	New Appendix		<p>Insert a new appendix titled “Allocation of surface water and groundwater quantity” identifying:</p> <ol style="list-style-type: none"> <li>1. <u>Groundwater</u> <ol style="list-style-type: none"> <li>a. <u>Fully allocated aquifers;</u></li> <li>b. <u>Potentially over allocated aquifers; and</u></li> <li>c. <u>Aquifers with reliability of supply constrained by surface water allocation.</u></li> </ol> </li> <li>2. <u>Surface water</u> <ol style="list-style-type: none"> <li>a. <u>Over allocated surface water bodies;</u></li> <li>b. <u>Potentially over allocated surface water bodies; and</u></li> <li>c. <u>Surface water bodies with reliability of supply constrained by ground and / or surface water allocation.</u></li> </ol> </li> </ol> <p><b>Groundwater allocation:</b></p> <p><u>Fully allocated aquifers:</u></p> <ol style="list-style-type: none"> <li>1. Mataura catchment: Knapdale aquifer (103% allocated);</li> <li>2. Oreti catchment: Lumsden aquifer (108% allocated); and</li> <li>3. Waiau catchment: Lower Waiau (3.3% allocated) and Te Anau (2.3% allocated) aquifers;</li> </ol> <p>Allocation of hydraulically connected groundwater in the Waiau catchment is currently a non-complying activity, however the catchment is fully allocated in terms of surface water allocation.</p> <p><u>Potentially over allocated aquifers:</u></p> <ol style="list-style-type: none"> <li>1. Riversdale aquifer (33.6% allocated).</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>Fish &amp; Game submits that the Environment Court decision in <i>South Otago Holdings v Southland Regional Council</i> ([2011] NZ EnvC 120, 6 May 2011) effectively precludes additional allocation from the Riversdale aquifer due to cumulative effects on spring fed streams notwithstanding that it is not technically fully allocated. Specifically, the Court identified that:</p> <ol style="list-style-type: none"> <li>a. There has been a significant reduction in the 7-day MALF in the Meadow Burn at Round Hill since 1996, i.e. subsequent to irrigation. Various experts concluded that 7-day MALF had reduced by 42 – 53%; and</li> <li>b. The flow in the Meadow Burn has been reduced by the combined effect of abstractions from the Riversdale aquifer. The minimum summer time flow in the Meadow Burn at Round Hill is less than the minimum flow recommended by Environment Southland for the protection of trout and may be insufficient to protect the habitat of Gollum galaxias in the upper reaches of the Meadow Burn.</li> </ol> <p><u>Aquifers with reliability of supply constrained by surface water allocation:</u></p> <ol style="list-style-type: none"> <li>1. Mataura catchment: Upper Mataura, Cattle Flat, Waipounamu and Wendon aquifers have low supply reliability due to minimum flow cut-off's to maintain compliance with the Mataura WCO;</li> </ol> <p><b>Surface water allocation:</b></p> <p><u>Over allocated surface water bodies:</u></p> <ol style="list-style-type: none"> <li>1. Cromel Stream; and</li> <li>2. Waiau catchment (including lake tributaries and Mararoa and Waiau Rivers)</li> </ol> <p>Operation of the Manapouri Hydro-Electric Power Scheme on Lake Manapouri results in the diversion of up to 90% of the flow in the Waiau catchment and its discharge into Doubtful Sound. Minimum flows set for the lower Waiau River are the 'bottom line' for</p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>maintaining sufficient in-stream habitat for trout.</p> <p><u>Potentially over allocated surface water bodies:</u></p> <ol style="list-style-type: none"> <li>1. Oreti catchment: Irthing Stream (including upstream Five Rivers catchment)</li> </ol> <p>Fish &amp; Game submits that Council should prioritise and resolve existing unconsented surface water takes in the Five Rivers catchment. No unconsented historic takes should not be operating at this point in time. Allowing unconsented diversions and takes to continue in the Five Rivers catchment whilst allocating further surface water, as has been occurring under the operative Water Plan, has the potential to result in:</p> <ol style="list-style-type: none"> <li>a. An over allocation scenario; and</li> <li>b. Drawing down flows in the Five Rivers catchment beyond minimum flow(s) during periods of reduced flow.</li> </ol> <p>Case law<sup>11</sup> provides that under s 14(3) of the RMA the exception to taking and using water where it is required for stock drinking water only applies to taking and using water. It does not apply to <i>diverting</i> water. Consent is required if a person wishes to divert water for stock drinking water.</p> <p><u>Surface water bodies with reliability of supply constrained by ground and / or surface water allocation:</u></p> <ol style="list-style-type: none"> <li>1. Mataura catchment: Mataura River (upper, mid and lower reaches), Waikaia River, Waimea Stream.</li> </ol> <p>Due to flow allocation provisions of the Mataura Water Conservation Order the above</p>

<sup>11</sup> Chatham Islands Seafoods Ltd v Wellington Regional Council (Environment Court, Wellington A018/2004, 13 February 2004).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>surface water bodies are allocated to a point where reliability of supply is significantly constrained for run of river abstraction.</p> <p>2. Oreti catchment: Irthing Stream (including upstream Five Rivers catchment) and upper Oreti catchment.</p> <p>3. Aparima catchment: upper catchment.</p> <p>Both the Oreti and Aparima catchments are &gt;50% allocated based upon lowland flows, but close to full allocation in upper catchment areas.</p> <p>4. Waiau catchment.</p>

### Map Series

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
43.9	BAKER Shane & SHAW Wendy	Map series 7		Grindstone Creek catchment should be recognised as a separate catchment.
47.29	Balfour, Wendonside & Waikaia Group	Map series 4	Oppose	In the first instance we seek that the Physiographic Zones are outside of the PSWLP, until such time as they can be validated and ground truthed. Removal of the Old Mataura Zone altogether. We seek that the activity status may change if your zone can be proved/disproved.
62.16	Beef + Lamb NZ	Map series 4	Oppose	Delete all physiographic zone maps from the Plan.
83.9	BOKSER Greg	Maps	Oppose Amend	To enable each property owner to fully understand the impact on their property, more detailed maps should be supplied in order to establish property boundaries.
93.10	Broadacres Ltd	Map series	Oppose	Oppose maps and enable each property owner to fully understand the impact on their property.
94.8	Brooklea Farm Ltd	Map series 4	Oppose	Delete map series 4 "Old Mataura" and have it sit alongside the plan until it is validated.
101.16	BUCKINGHAM Thomas	Map series 4	Oppose	The physiographic maps lack detail and are very broad. The science has not been proven nor is the detail up to a standard where a farmer can view the map and tell that it is correct because he is familiar with his different soils. Currently it is very confusing and, in the case of our farm,

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				incorrect and not fit to be used as a regulatory tool.
144.6	CLEARWATER Sue	Map Series 4	Oppose	I would like a review zoning and or a move to utilise on farm management/monitoring to maintain water quality.
189.54	Dairy Holdings Ltd	Map 22		Amend Map 22 to remove Peat Wetlands classification from Valley Views paddock 6 (see original submission for detail). Replace with Oxidising, overland flow.
193.3	David McKee Farms Ltd	Maps	Oppose	Amend mapping to give a lot more weight to the soil types that Topoclimate observed.
238.4	Eaton Willow Lodge (Derek Eaton)	Map series 4	Oppose	We do not support the physiographic maps. We find this map very inaccurate.
239.4	Eaton Willow Lodge (Paul & Elaine Eaton)	Map series 4	Oppose	We do not support the physiographic maps. We find this map very inaccurate.
245.7	Enfield Ltd	Map series 4	Oppose	Amend physiographic zoning to be consistent with Terralink Soil Zoning map.
247.36	Environment Southland	Map series 3	Amend	Amend the Map Series 3 – Groundwater Management Zones index page to list the following management zones: <ol style="list-style-type: none"> <li>1. Awarua</li> <li>2. Blackmount</li> <li>3. Castlerock</li> <li>4. Cattle Flat</li> <li>5. Central Plains</li> <li>6. Centre Hill</li> <li>7. Croydon</li> <li>8. Dipton</li> <li>9. Edendale</li> <li>10. Five Rivers</li> <li>11. Knapdale</li> <li>12. Longridge</li> <li>13. Lower Aparima</li> <li>14. Lower Mataura</li> <li>15. Lower Oreti</li> <li>16. Makarewa</li> <li>17. Orepuki</li> <li>18. Oreti</li> <li>19. Riversdale</li> <li>20. Te Anau</li> </ol>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				21. Te Waewae 22. Tiwai 23. Upper Aparima 24. Upper Mataura 25. Waihopai 26. Waimatuku 27. Waimea Plains 28. Waipounamu 29. Wendon 30. Wendonside 31. Aquifers
247.37	Environment Southland	Map series 4	Amend	Insert Map 18, which is attached at Appendix 3.
265.110	Federated Farmers of NZ (Southland Province)	Map series 4	Oppose	Remove the physiographic maps from the Plan – this resource would sit outside the Plan similar to good management practices. Enable the resource to be utilised by farmers to inform good management practices and voluntary mitigation measures on-farm. Require region-wide implementation of good management practises in order to maintain and improve water quality in the lead-up to limit-setting.
266.8	Fenham Downs Ltd	Maps - Physiographic Zones	Oppose	Environment Southland consider making this map more accurate, redoing it and getting it right if they want to enforce some of these Policies and Rules.
337.22	Growplan Ltd	Maps		These are very hard to use, what about a grid, plus legal lot lines to make it easier to see where one is.
358.16	HASTIE Stephen	Map Series 1 – Qater Quality (31)	Oppose	Needs to be better laid out, with correct labelling of roads.
419.3	J R & D M Smith Ltd	Map series 4	Oppose	We seek that the physiographic zones are disregarded until these zones can be validated and ground truthed. Also the Old Mataura zone removed altogether and treated like the most similar or nearest zone.
437.27	KEMPTHORNE Robert	Map series 7	Oppose in part	Waiau FMU map and all supporting documentation must be changed to reflect true catchment movement of water.
457.3	L & M Ashers Waituna Limited	Maps		Clarification/identification of the spatial extent of the ‘Awarua Plan – Southland Estuaries’ identified as a Regionally Significant Wetland in Southland within Appendix A.
487.8	M K H Farming Ltd	Map series 4	Oppose	I oppose the use of PZ maps, in the PZWLP. I particularly oppose the boundaries of the old

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Mataura Zone.
498.7	MANN Alistair	Map series 4	Oppose	Seek the removal of the Old Mataura Zone altogether.
542.6	MCLEAN David	Map series 4	Oppose	Review zoning and or a move to utilise on farm management/monitoring to maintaining water quality.
681.24	Rockytommy Farming Ltd	Map series 4	Oppose	In the first instance we seek that the Physiographic Zones are outside of the PSWLP, until such time as they can be validated and ground truthed.  We seek the removal of the Old Mataura Zone altogether.  We seek that the activity status may change if your zone can be proved/disproved.
682.18	Rokenwai Farming Ltd	Map series 4	Oppose	In the first instance we seek that the Physiographic Zones are outside of the PSWLP, until such time as they can be validated and ground truthed.  We seek the removal of the Old Mataura Zone altogether.  We seek that the activity status may change if your zone can be proved/disproved.
684.7	ROSE David	Map series 4	Oppose	Remove the Physiographic maps from the plan.
759.29	Springlands Group Ltd	Map series 4	Oppose	In the first instance we seek that the Physiographic Zones are outside of the PSWLP, until such time as they can be validated and ground truthed.  We seek the removal of the Old Mataura Zone all together. We seek that the activity status may change if your zone can be proved/disproved.
775.10	Stoney Creek Station Ltd	Maps	Oppose Amend	To enable each property owner to fully understand the impact on their property, more detailed maps should have been supplied in order to establish property boundaries.
824.10	Tulloch Farm Glendhu Ltd	Maps	Oppose	Oppose maps and enable each property owner to fully understand the impact on their property.
825.11	Tulloch McNab Transport Ltd	Maps	Oppose Amend	To enable each property owner to fully understand the impact on their property

## Section 32 report

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
40.17	BAKER David	Section 32 report		Do a better report to show the true impact and cost this plan is going to have for both farmers and the region's economy.
54.18	Bayswater Dairy Ltd	Section 32 report	Oppose	We feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
54.19	Bayswater Dairy Ltd	Section 32 report	Oppose	We feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
280.3	Forward Holdings Ltd	Section 32 report		Section 32 of the RMA has not been investigated enough in this plan, costs against benefits.
339.17	GUNN Olivia	Section 32 report	Oppose	We feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
361.17	HBG AgriLimited	Section 32 report	Oppose	In terms of the Section 32, we feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
386.19	Hopcroft Farms Ltd	Section 32 report	Oppose	I feel that a lot more work needs to be done. I would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
482.25	Lower Aparima Catchment Group	Section 32 report	Oppose	We feel that a lot more work needs to be done. We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
761.19	STALKER Hanna & Callum	Section 32 report	Oppose	We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
798.13	TEMPLETON Luke	Section 32 report	Oppose	I feel that a lot more work needs to be done. I would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
799.15	TEMPLETON Peter	Section 32	Oppose	I would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.
840.11	W & B Clarke & Son Ltd	Section 32 report		To state that the costs will be consenting and compliance costs is absolutely false; costs will be far more wide spread than just monetary costs, consideration needs to be given to productive land loss and, stock unit carrying capacity of a paddock, the time resource lost which are all things that impact the farming business and also to the cost to the community from the potential stress caused to farmers which will affect relationships, families and interactions



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				within the local community, with the potential to create a cost to the health care sector.
861.31	WHITE John Copeland	Section 32	Oppose	We would like to see a full economic impact report that is of the required standard to adequately model the likely economic impacts of this Plan.

### Definitions - General

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.27	Real Journeys Ltd	General		Provide a more extensive list of definitions for the avoidance of doubt i.e. clarify if rock riprap includes gabion baskets.
750.23	Southland District Council	Raw Sewage		Council notes there are two separate definitions for sewage and raw sewage, and queries whether there is a need for the separate terms?
752.196	Southland Fish & Game Council	New definition	Oppose	Insert an appropriate definition of “maintaining the quality of water” and “improving the quality of water” into the Glossary of the pWLP.
865.10	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	New definition		Define intermittent stream, drain, pond or wetland.

### Definitions - Abstraction

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.197	Southland Fish & Game Council	Abstraction	Support	Retain.

### Definitions - Agrichemical

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
247.38	Environment Southland	Agrichemical	Amend	Amend Agrichemical definition to read: <u>Agrichemical (from NZS 8409 Management of Agrichemicals)</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				Any substance, whether inorganic or organic, man-made or naturally occurring, modified or in its original state, <del>that is used in any agricultural, horticulture or related activity,</del> to eradicate, modify, or control flora and fauna. For the purposes of this Plan, it includes agricultural compounds, but excludes fertilisers, vertebrate pest control products and oral nutrition compounds.
390.40	Horticulture NZ	Agrichemical	Support in part	Amend definition of agrichemical as from NZS8409:2004 Management of Agrichemicals.
523.20	MCGREGOR Grant	Agrichemical		The definition should be widened to ensure it includes other uses other than agricultural or horticultural such as river management.
614.39	NZ Transport Agency	Agrichemical		Agrichemical (from NZS 8409 Management of Agrichemicals) - Any substance, whether inorganic or organic, man-made or naturally occurring, modified or in its original state, <del>that is used in any agriculture, horticulture or related activity,</del> to eradicate, modify or control flora and fauna. For the purposes of this Plan, it includes agricultural compounds, but excludes fertilisers, vertebrate pest control products and oral nutrition compounds.
752.198	Southland Fish & Game Council	Agrichemical	Support	Retain.

### Definitions – Agricultural effluent

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
661.44	Ravensdown Ltd	Agricultural effluent	Support in part	Ravensdown seeks that the intent of the definition of ‘agricultural effluent’ be retained, with the following amendment: <del><b>Agricultural</b></del> <b>Animal effluent</b> Effluent that is derived from livestock farming, but excludes excreta from individual animals, fertiliser application and non-point source discharges from normal farming practices.
752.199	Southland Fish & Game Council	Agricultural effluent	Support	Retain.
803.45	The Fertiliser Association of NZ	Agricultural effluent	Support in part Amend	Amend the definition of ‘agricultural effluent’ is amended as follows: <del><b>Agricultural</b></del> <b>Animal effluent</b> Effluent that is derived from livestock farming, but excludes excreta from individual animals,

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				fertiliser application and non-point source discharges from normal farming practices

### Definitions – Agricultural effluent storage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.111	Federated Farmers of NZ (Southland Province)	Agricultural effluent storage	Support in part	Amend the definition of ‘agricultural effluent storage’ as follows:  A pond, tank or structure used for the containment, storage or treatment of agricultural effluent that has a storage capacity larger than 22.5m <sup>3</sup> .
661.45	Ravensdown Ltd	Agricultural effluent storage	Support in part	Ravensdown seeks that the definition of ‘Agricultural effluent storage’ be amended as follows: <b><del>Agricultural Animal</del> effluent storage</b> A pond, tank or structure used for the containment, storage or treatment of <del>agricultural animal</del> effluent.
663.8	RDAgritech Ltd	Agricultural effluent storage	Amend	Amend the definition of storage such that, for the purposes of Rules 32 to 35, any stone trap or pump sump that is less than 5m <sup>3</sup> volume is not considered to be effluent storage.  Alternatively, amend Rules 32, 33, 34 and 35 to exempt any stone trap or pump sump that is less than 5m <sup>3</sup> from the drop test requirement, provided that the structure is completely emptied, cleaned and visually inspected for any cracks or leakage.
752.200	Southland Fish & Game Council	Agricultural effluent storage	Support	Retain.
803.46	The Fertiliser Association of NZ	Agricultural effluent storage	Support in part Amend	Amend the definition of Agricultural effluent storage’ is amended as follows: <b><del>Agricultural Animal</del> effluent storage</b> A pond, tank or structure used for the containment, storage or treatment of <del>agricultural animal</del> effluent.

### Definitions – Allocation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.201	Southland Fish & Game Council	Allocation	Support	Retain.

### Definitions – Aquifer

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.202	Southland Fish & Game Council	Aquifer	Support	Retain.

### Definitions – Artificial watercourse/waterbody

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
47.30	Balfour, Wendonside & Waikaia Group	Artificial waterbody	Amend	Amend the definition to include ‘duck pond’.
190.23	DairyNZ	Artificial watercourse	Support Amend	Amend to: Artificial watercourse means a watercourse that is created by human action. It includes an irrigation canal, water supply race, canal for the supply of water for electricity power generation, <del>and</del> a farm drainage channel, <u>and constructed or artificial wetlands.</u>
198.8	DIACK Hugh	Artificial watercourse	Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more’.
390.41	Horticulture NZ	Artificial watercourse	Oppose in part	Amend the definition of artificial watercourse by adding to the exclusions: <u>or subsurface drainage systems.</u>
449.41	KiwiRail Holdings Ltd (KiwiRail)	Artificial watercourse	Support	Retain.
569.19	MILLER R J Trust	Artificial waterbody	Amend	Amend the definition to include duck pond.
663.9	RD Agritech Ltd	Artificial watercourse	Amend	Retain a definition for “artificial watercourse” (either as-written or suitably amended to support other definitions).

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
678.9	ROBINSON Jeffrey	Artificial watercourse	Oppose	Amend the rule to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
679.9	ROBINSON Michael	Artificial watercourse		Include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
681.25	Rockytommy Farming Ltd	Artificial watercourse	Amend	Amend the definition to include ‘duck pond’.
682.19	Rokenwai Farming Ltd	Artificial watercourse	Amend	Amend the definition to include ‘duck pond’.
752.203	Southland Fish & Game Council	Artificial watercourse	Support	Retain.
759.30	Springlands Group Ltd	Artificial watercourse	Amend	Amend the definition to include ‘duck pond’.
804.3	TIPPETT Christie	Artificial watercourse	Oppose Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
895.58	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Artificial watercourse	Support	Retain.

### Definitions – Biodiversity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.204	Southland Fish & Game Council	Biodiversity	Support	Retain.

### Definitions – Bore

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
449.42	KiwiRail Holdings Ltd (KiwiRail)	Bore and well	Support	Retain.
614.40	NZ Transport Agency	Bore	Amend	Bore or Well - Any structure or hole, regardless of the method of formation, that has been constructed to provide access to groundwater, or which intercepts groundwater <u>excluding test pits and soak holes associated with State highways</u> .
752.205	Southland Fish & Game Council	Bore	Support	Retain.
895.59	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Bore and well	Amend	Amend as follows: Any structure or hole, regardless of the method of formation, that has been constructed to provide access to groundwater, <del>or which intercepts groundwater.</del>

#### Definitions – Catchment

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.206	Southland Fish & Game Council	Catchment	Support	Retain.
803.47	The Fertiliser Association of NZ	Catchment	Support in part Amend	Amend the definition ‘catchment’ is amended as follows: <b>Catchment</b> The land area that contributes <u>to</u> the river’s or stream’s flow.
895.60	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Catchment	Support	Retain.

#### Definitions – Cleanfill

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
288.38	Fulton Hogan Ltd & Southern Aggregates Ltd	Cleanfill	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
342.9	H W Richardson Group	Cleanfill	Support	Retain.
752.207	Southland Fish & Game Council	Cleanfill	Support	Retain.

### Definitions – Cleanfill site

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
342.10	H W Richardson Group	Cleanfill site	Oppose in part	Amend definition as follows:  Land used for the permanent disposal of cleanfill and no other type of material but excludes <u>land in the same landholding used for:</u> <ul style="list-style-type: none"> <li>- <del>earthworks on the same landholding,</del></li> <li>- earthworks associated with any road, driveway or track, and</li> </ul> any area within a road reserve containing a formed road that is used for the deposition of roading material.
752.208	Southland Fish & Game Council	Cleanfill site	Support	Retain.

### Definitions – Closed landfill

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.209	Southland Fish & Game Council	Closed landfill	Support	Retain.

### Definitions – Community sewage scheme

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
330.18	Gore District Council,	Community	Oppose	The definition of ‘Community sewage scheme’ be amended as follows:

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Invercargill City Council and Southland District Council	sewage scheme	Amend	<b>Community sewage scheme</b> A scheme that collects and treats sewage from more than <u>one landholding</u> <del>three sites</del> which <del>are</del> <u>is</u> predominantly <u>from</u> residential housing, but may include a component of industrial and trade process effluent. <u>It includes both Council operated and privately operated schemes.</u>
752.210	Southland Fish & Game Council	Community sewage scheme	Support	Retain.
750.24	Southland District Council	Community sewage scheme	Amend	Amend the definition of Community Sewerage Scheme: “A scheme that collects and treats sewage from more than three sites which are predominantly residential housing, but may include a component of industrial and trade process effluent. <u>It includes both Council operated and privately operated schemes.</u> ”

#### Definitions – Community water supply

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.211	Southland Fish & Game Council	Community water supply	Support	Retain.

#### Definitions – Composting toilet

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.212	Southland Fish & Game Council	Composting toilet	Support	Retain.

#### Definitions – Confined aquifer

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.213	Southland Fish & Game Council	Confined aquifer	Support	Retain.



## Definitions – Crest

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.214	Southland Fish & Game Council	Crest	Support	Retain.

## Definitions – Critical source area

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.17	Beef + Lamb NZ	Critical source area	Support in part Amend	Work with industry to develop an agreed definition of critical source area. As a starting point, amend definition to read: <u>Small Areas, up to X<sup>m</sup><sup>2</sup> [use an industry agreed definition of small]</u> of enriched nutrient or sediment sources and hydrological activity <u>where runoff</u> <del>that occur in small parts of a catchment or farm,</del> but contributes a disproportionately large amount of nutrient or sediment to the environment (e.g. <del>steep hills,</del> gullies or swales). Critical source areas are small low-lying parts of farms such as gullies and swales, where runoff accumulates in high concentration.
185.5	D J & D A Anderson Ltd	Critical source area	Amend	E.S needs to provide some discretion on extensive uncultivated country which also is extensively grazed so fencing isn't automatically a requirement. Discretion on for extensively run hill country properties i.e. cultivated hill per SU basis or degree's, and un cultivated hill per SU basis. Consideration to the environment to protect the soils and water from quality degradation.
365.12	HEENAN M D and D W	Critical source area	Amend	Amend definition to provide clarity on what 'small parts of a catchment or farm' means in practice.
518.14	MCDONALD Stuart & HALDER Robyn	Critical source area		Some elaboration is needed on these.
661.46	Ravensdown Ltd	Critical source area	Support	Retain.
752.215	Southland Fish & Game Council	Critical source area	Support	Retain.
803.48	The Fertiliser Association of NZ	Critical source area	Support	Retain.

## Definitions – Cultivation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.37	Ardel Dairies Ltd	Cultivation	Oppose	Remove the current definition and reword to be more specific.
47.31	Balfour, Wendonside & Waikaia Group	Cultivation	Oppose	Amend the definition of cultivation to say: “The mechanical disturbance of the soil for the purpose of planting crops or pasture, but excluding mole ploughing, aeration and direct drilling”.
54.20	Bayswater Dairy Ltd	Cultivation	Oppose	Spraying (spray and pray or blanket spraying) should not be classified as cultivation. Blanket spraying is required for noxious weed control. Allowing weeds such as gorse to get out of control will have a significant impact on the water quality, particularly nitrogen levels.
56.9	BEATTIE Michael & Lynley	Cultivation	Oppose	Remove spraying from cultivation rule.
62.18	Beef + Lamb NZ	Cultivation	Oppose Amend	Amend definition to remove non-mechanical cultivation techniques: Preparing land for growing pasture or a crop by mechanical tillage <del>or spraying (excluding spot spraying)</del> .
74.6	BLACK G L & R R	Cultivation	Amend	Remove reference to ‘spraying’.
83.10	BOKSER Greg	Cultivation	Oppose	Amend the definition of cultivation to specifically exclude the practice referred to as spray and pray (aerial).
93.11	Broadacres Ltd	Cultivation	Amend	Amend the definition of cultivation to specifically exclude spray and pray (aerial).
96.3	BROWNING Stuart	Cultivation	Neutral	A better definition is required.
152.30	Clover Bell Ltd	Cultivation	Amend	Amend the glossary to specifically exclude direct drilling of seeds from the definition of cultivation.
186.8	D R & J A E Pullar Ltd	Cultivation	Amend	Remove the reference to spraying in the definition. To remove any doubt, direct drilling should be specifically excluded in the definition.
208.8	DILLON M J & S E	Cultivation	Amend	Remove “spraying” from the definition of cultivation.
220.19	Drylands Farming Ltd	Cultivation	Oppose	Remove broad spraying from the definition. Also clarification on whether aerating and mole ploughing is deemed to be cultivating and should not be so, along with direct drilling and spraying.
221.19	DRYSDALE Family Trust	Cultivation	Oppose	Remove broad spraying from the definition. Also clarification on whether aerating and mole ploughing is deemed to be cultivating and should not be so, along with direct drilling and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				spraying.
233.32	DYSON Valerie &Glyn	Cultivation	Amend	Amend the definition of cultivation read: Preparing of land for growing pasture or crop by full mechanical tillage.
249.34	Ernslaw One Ltd	Cultivation	Amend	Amend the definition of cultivation to exclude that slash raking & line raking in plantation forestry.
258.31	Eyre Creek Ltd	Cultivation	Support in part	Amend cultivation to : ‘preparing land for growing pasture or a crop by mechanical tillage’
259.19	F D Enterprises Ltd	Cultivation	Oppose	Amend the definition of cultivation to say: “The mechanical disturbance of the soil for the purpose of planting crops or pasture”.
264.14	FarmRight Ltd	Cultivation	Oppose	Delete the definition of cultivation and replace with: “ <u>the mechanical disturbance of the soil for the purpose of planting crops or pasture</u> ”
265.112	Federated Farmers of NZ (Southland Province)	Cultivation	Support in part	Amend the definition of ‘cultivation’ as follows:  Preparing land for growing pasture or a crop by <u>full</u> mechanical tillage <del>or spraying (excluding spot spraying)</del> . (this excludes spraying and direct drilling).
296.10	GARDYNE G W & E L Trust & C K Gardyne Ltd	Cultivation	Amend	The words “spraying” be taken out and amend the date range to be mid May to mid-August.
299.23	GARDYNE John	Cultivation	Oppose	Cultivation definition should not include spraying and direct drilling
324.4	Glentui Farms Ltd	Cultivation	Oppose	Spray and pray technique be exempt from “cultivation where just going directly to grass.
331.10	GRANT J J & J L	Cultivation	Oppose	Remove spraying, direct drilling, mole ploughing and aeration from definition of cultivation.
334.7	Greenvale Station Ltd	Cultivation	Amend	Spray and pray should not be restricted so that weed control can be managed.
339.18	GUNN Olivia	Cultivation		Spraying (spray and pray or blanket spraying) should not be classified as cultivation. Blanket spraying is required for noxious weed control. Allowing weeds such as gorse to get out of control will have a significant impact on the water quality, particularly nitrogen levels.
361.18	HBG AgriLimited	Cultivation		Delete blanket spraying and spray and pray being included in the definition of cultivation.
365.13	HEENAN M D and D W	Cultivation	Amend	Amend definition to exclude direct drilling from the definition.
386.20	Hopcroft Farms Ltd	Cultivation	.	Spraying (spray and pray or blanket spraying) should not be classified as cultivation
390.42	Horticulture NZ	Cultivation	Oppose in part	Amend the definition of cultivation: Preparing land for <u>the growing and harvesting of</u> pasture <u>of</u> <del>or a</del> crop by mechanical tillage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				and includes sediment control measures, but does not include direct drilling <del>or spraying</del> (excluding spot spraying).
402.21	HUNT Alistair & Bernadette	Cultivation	Amend	Amend the definition of cultivation to read: Preparing <u>of</u> land for growing pasture or crop by full mechanical tillage <del>or spraying</del> (excluding spot spraying).
464.37	Landpro Ltd	Cultivation	Oppose	Amend the definition of cultivation to say; “The mechanical disturbance of the soil for the purpose of planting crops or pasture”.
482.26	Lower Aparima Catchment Group	Cultivation	Oppose	Spraying (spray and pray or blanket spraying) should not be classified as cultivation.
486.7	M Gardyne Ltd	Cultivation	Amend	Remove spraying from the term cultivation and define between full spray outs of pastures to selective weed, fungicide and pesticide control.
487.9	M K H Farming Ltd	cultivation	OpposeAmend	Amend this definition this cultivation to say, “The mechanical disturbance of the soil of the purpose of planting seeds”.
518.15	MCDONALD Stuart & HALDER Robyn	Cultivation		Please make it clear that your definition of ‘cultivation’ includes ‘spraying’ by using the term ‘cultivation and spraying’.
550.3	MCNAMEE T W & J N	Cultivation	Oppose	Provide clearer definition of cultivation would be good i.e. is this ploughing/discing/direct drilling?
564.19	Mid-Aparima Catchment Group	Cultivation		Spraying (spray and pray or blanket spraying) should not be classified as cultivation. Blanket spraying is required for noxious weed control. Allowing weeds such as gorse to get out of control will have a significant impact on the water quality, particularly nitrogen levels.
565.5	MIDDLETON Lindsay	Cultivation	Amend	Define if low or no tillage options such as direct drilling are deemed to be the same as soil inversion methods.
575.3	MITCHELL Keith	Cultivation	Amend	Remove “spraying” from the definition.
604.14	Nokomai Station Ltd	Cultivation	Oppose	Cultivation is redefined to exclude spraying, therefore removing an unnecessary consenting requirement. Amend the definition of cultivation to say: “The mechanical disturbance of the soil for the purpose of planting crops or pasture”.
616.11	O’CONNELL Elizabeth	Cultivation		That the definition of mechanical tillage does not include direct drilling by way of spraying; or any mole ploughing or aeration techniques.
622.33	P F Olsen Ltd	Cultivation	Amend	Amend the definition of cultivation to make clear that Forestry slash raking or line raking (typically undertaken with an excavator), where there is no significant disturbance of the subsoil, is not defined as cultivation. By contrast downhill Root Raking, as practiced in forestry

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				typically using a bulldozer with special pronged blade or rippers, is cultivation.
627.7	PATERSON Ross	Cultivation	Amend	Remove spraying from definition of cultivation.
628.8	PATERSON Stephanie	Cultivation	Amend	Remove spraying from definition of cultivation.
662.4	Rayonier NZ Ltd	Cultivation	Amend	Amendment to the definition of “cultivation” to explicitly exclude post-harvest slash raking.
667.12	Riverfield Farms Ltd	Cultivation	Amend	Remove spraying from cultivation definition.
668.9	Riverdale Dairies Ltd	Rule 25	Oppose	Remove spraying from the cultivation definition.
671.3	ROBERTS Andrew	Cultivation	Amend	I would like to see the definition of cultivation amended with the removal of ‘spraying’ from the definition.
681.26	Rockytommy Farming Ltd	Cultivation	Oppose	Amend the definition of cultivation to say: “the mechanical disturbance of the soil for the purpose of planting crops or pasture, but excluding mole ploughing, aeration and direct drilling.”
682.20	Rokenwai Farming Ltd	Cultivation	Oppose	Amend the definition of cultivation to say: “the mechanical disturbance of the soil for the purpose of planting crops or pasture, but excluding mole ploughing, aeration and direct drilling.”
704.7	Ryan Farms 2006 Ltd	Cultivation	Oppose	Remove spraying from cultivation definition.
737.34	Smithill Ltd	Cultivation		Spraying (spray and pray or blanket spraying) should not be classified as cultivation. Blanket spraying is required for noxious weed control. Allowing weeds such as gorse to get out of control will have a significant impact on the water quality, particularly nitrogen levels.
752.216	Southland Fish & Game Council	Cultivation	Support	Retain.
759.31	Springlands Group Ltd	Cultivation	Oppose	Amend the definition of cultivation to say: “The mechanical disturbance of the soil for the purpose of planting crops or pasture, but excluding mole ploughing, aeration and direct drilling”.
761.20	STALKER Hanna & Callum	Cultivation	Oppose	Spraying should not be classified as cultivation.
775.11	Stoney Creek Station Ltd	Cultivation	Amend	Amend the definition of cultivation to specifically exclude spray and pray (aerial).
784.4	Sunnyside Station	Cultivation	Oppose	Broadacre spraying taken out.
790.14	TAIT G R & J E &	Cultivation	Oppose	Definition includes spraying but this has less impact on soil movement than full ploughing and

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Waikawa Valley Trust			should be defined separately.
803.49	The Fertiliser Association of NZ	Cultivation	Support	Retain.
807.10	The Terraces Ltd	Cultivation		Amend the definition of cultivation to specifically exclude spray & pray (aerial).
822.9	Tremaine Farming Partnership	Cultivation	Oppose	Remove the inclusion of spraying from the definition of cultivation.
824.11	Tulloch Farm Glendhu Ltd	Cultivation	Oppose	Amend the definition of cultivation to specifically exclude spray and pray (aerial)
825.12	Tulloch McNab Transport Ltd	Cultivation		Amend the definition of cultivation to specifically exclude the practice referred to as spray and pray (aerial).
827.10	TURNER Paul & Kayleen	Cultivation	Oppose	Remove spraying from cultivation rule.
830.8	Upper Aparima Catchment Group	Cultivation	Oppose	Remove spraying from cultivation definition.
833.9	VAN ROOIJEN Marcel	Cultivation	Oppose	Remove spraying from cultivation definition.
856.8	West Range Farms Ltd (Bronwyn Chamberlain)	Cultivation	Oppose	Spraying should be excluded from the cultivation definition.
857.9	West Range Farms Ltd (Derek Chamberlain)	Cultivation	Oppose	Spraying should be excluded from the cultivation definition.
861.32	WHITE John Copeland	Cultivation	Oppose	Spraying (spray and pray or blanket spraying) should not be classified as cultivation.
863.9	Whiterig Dairy Farm	Cultivation	Neutral	Define cultivate.
866.8	WILKINS Brendan	Cultivation	Oppose	Amend the definition as mechanical tillage only.
868.37	Wilkins Farming Ltd	Cultivation	Support in part	Amend cultivation: 'preparing land for growing pasture or a crop by mechanical tillage' (i.e.) methods that disturb the soil and the root systems that bind it. Spray and pray, direct drilling and mole ploughing should NOT be included as cultivation.
875.9	Willowbank Farms 2015 Ltd & Avondale Dairies	Cultivation	Oppose	Remove spraying from cultivation.

### Definitions – Damming

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.217	Southland Fish & Game Council	Damming	Support	Retain.

### Definitions – Deposition

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.218	Southland Fish & Game Council	Deposition	Support	Retain.

### Definitions – Diadromous

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.219	Southland Fish & Game Council	Diadromous	Support	Retain.

### Definitions – Diversion

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.220	Southland Fish & Game Council	Diversion	Support	Retain.

### Definitions – Domestic wastewater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
330.19	Gore District Council, Invercargill City Council and	Domestic wastewater	Oppose	The definition of 'domestic wastewater' be deleted.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Southland District Council		Amend	
658.2	Ralph Moir & Associates	Domestic wastewater	Amend	Amend the definition of domestic wastewater in the glossary by removing the specific exclusion of wastewater from commercial kitchens.
750.25	Southland District Council	Domestic wastewater	Amend	Amend the definition for domestic wastewater as follows:  “For the purposes of this rule, domestic wastewater is limited to effluent derived from dwellings, business buildings, institutes and the like, and consisting of toilet wastes and wash waters from kitchens bathrooms and laundries, but excluding commercial laundry <del>and commercial kitchen</del> wastes.”
752.221	Southland Fish & Game Council	Domestic wastewater	Support	Retain.

#### Definitions – Drawdown

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.222	Southland Fish & Game Council	Drawdown	Support	Retain.

#### Definitions – Dry cut

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.223	Southland Fish & Game Council	Dry cut	Support	Retain.

#### Definitions – Dump station

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.224	Southland Fish & Game Council	Dump station	Support	Retain.



### Definitions – Ecosystem

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.225	Southland Fish & Game Council	Ecosystem	Support	Retain.

### Definitions – Effluent/effluent storage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
247.39	Environment Southland	Effluent	Amend	Amend Effluent definition to read: <u>Effluent</u> A liquid that may include solid components discharged as a waste that originates from: (a) on-site wastewater systems, <u>composting toilet system</u> , and mobile toilets; (b) community sewerage schemes; (c) agricultural activities; (d) an industrial or trade process; (e) but excludes solid waste.
666.31	Rimu Grasslands Ltd & Leicester Downs Ltd	Effluent storage	Amend	Redefine effluent storage.
752.226	Southland Fish & Game Council	Effluent	Support	Retain.

### Definitions – Ephemeral waterbodies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.227	Southland Fish & Game Council	Ephemeral waterbodies	Support	Retain.

## Definitions – Erosion control structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.228	Southland Fish & Game Council	Erosion control structures	Support	Retain.

## Definitions – Fertiliser

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.41	Ballance Agri-Nutrients	Fertiliser	Oppose	<p>Delete the definition of Fertiliser and replace with the as defined in the ACVM Regulations 2001:</p> <p>(a) <u>Means a substance or biological compound or mix of substances or biological compounds that is described as, or held out to be for, or suitable for, sustaining or increasing the growth, productivity, or quality of plants or, indirectly, animals through the application to plants or soil of</u></p> <p>i. <u>Nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chlorine, and sodium as major nutrients; or</u></p> <p>ii. <u>Manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine, and selenium as minor nutrients; or</u></p> <p>iii. <u>Fertiliser additives; and</u></p> <p>(b) <u>Includes non-nutrient attributes of the materials used in Fertiliser; but</u></p> <p>(c) <u>Does not include substances that are plant growth regulators that modify the physiological functions of plants.</u></p>
249.35	Ernslaw One Ltd	Fertiliser	Amend	Amend the definition of fertiliser to include Cadmium.
390.43	Horticulture NZ	Fertiliser	Oppose	<p>Amend the definition of Fertiliser to either the ACVM definition of fertiliser or the definition as follows:</p> <p>Fertiliser: <del>Any</del> <u>A substance or biological compound or mix of substances or biological</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><del>compounds (whether in solid or fluid form) that is described as, or held out to be for, or suitable for, sustaining or increasing the growth, productivity, or quality of plants or, indirectly, animals through the application to plants or soil of:</del></p> <p><del>i) essential nutrients and</del></p> <p><del>ii) fertiliser additives; and</del></p> <p><del>iii) non-nutrient attributes of the materials used in fertiliser. of the following essential nutrients to plants or soils [remove all stated nutrients].</del></p>
622.34	P F Olsen Ltd	Fertiliser	Amend	Amend description to ...”Any substance (whether in solid or fluid form) <u>including its inert bulking agents and contaminants (e.g. Cadmium) ...</u>
661.47	Ravensdown Ltd	Fertiliser	Support in part	<p>Ravensdown seeks the definition of ‘fertiliser’ be amended as follows:</p> <p><b>Fertiliser</b></p> <p>“Any substance (whether in solid or fluid form) that is described as or held out to be for, or suitable for sustaining or increasing the growth, productivity or quality of plants or animals through the application of the following essential nutrients to plants or soils: nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chloride, sodium as major nutrients; or manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine, selenium as minor nutrients or <u>fertiliser additives, and includes non-nutrient attributes of the materials used in fertiliser; but does not include substances that are plant growth regulators that modify the physiological functions of plants.</u>”</p>
752.229	Southland Fish & Game Council	Fertiliser	Support	Retain.
803.50	The Fertiliser Association of NZ	Fertiliser	Support in part Amend	<p>Amend the definition of ‘fertiliser’ is amended as follows:</p> <p>Fertiliser as defined in the ACVM Regulations 2001:</p> <p>(d) <u>Means a substance or biological compound or mix of substances or biological compounds that is described as, or held out to be for, or suitable for, sustaining or increasing the growth, productivity, or quality of plants or, indirectly, animals through the application to plants or soil of</u></p> <p>iv. <u>Nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chlorine, and sodium as major nutrients; or</u></p> <p>v. <u>Manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine, and selenium as</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>minor nutrients; or</u> vi. <u>Fertiliser additives; and</u>  (e) <u>Includes non-nutrient attributes of the materials used in Fertiliser; but</u> (f) <u>Does not include substances that are plant growth regulators that modify the physiological functions of plants.</u>

#### Definitions – Field capacity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.230	Southland Fish & Game Council	Field capacity	Support	Retain.

#### Definitions – Ford

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.231	Southland Fish & Game Council	Ford	Support	Retain.

#### Definitions – Fractured rock aquifer

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.232	Southland Fish & Game Council	Fractured rock aquifer	Support	Retain.

### Definitions – Galaxiid

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.233	Southland Fish & Game Council	Galaxiid	Support	Retain.

### Definitions – Gravel

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.234	Southland Fish & Game Council	Gravel	Support	Retain.

### Definitions – Groundwater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.235	Southland Fish & Game Council	Gourndwater	Support	Retain.

### Definitions – Habitat

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.236	Southland Fish & Game Council	Habitat	Support	Retain.
797.61	Te Runanga o Ngai Tahu	Habitat	Support in part	Amend to read: Habitat – The place or type of place where an organism or population naturally lives.

## Definitions – Headworks

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.237	Southland Fish & Game Council	Headworks	Support	Retain.

## Definitions - Intensive winter grazing

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.17	ADAMS A J & P G	Intensive winter grazing	Amend	Winter grazing should be June, July and August only.
25.38	Ardel Dairies Ltd	Intensive winter grazing	Oppose	Remove the definition to allow for animal welfare.
27.8	Arkley Farm Ltd	Intensive winter grazing		The difference of environmental damage between sheep and cattle be recognised e.g. the area of grazing by sheep before conditions are imposed be bigger than that of cattle, and also that crops with a yield of less than 10tDM/ha be excluded.
33.10	BACON V M	Intensive winter grazing	Oppose Amend	Map only new or upgraded drains and use nutrient traps to retain nutrients rather than be lost to water ways.
34.4	BAIRD A J & L S	Intensive winter grazing	Amend	Chicory, plantain and cereal crops need to be separated from brassica crops.
47.32	Balfour, Wendonside & Waikaia Group	Intensive winter grazing	Amend	Retain definition but include a definition of forage crops.
62.19	Beef + Lamb NZ	Intensive winter grazing	Oppose Amend	Amend definition to read: Grazing of <del>cattle and deer stock</del> between May and September (inclusive) on forage crops, <u>excluding pasture and cereal crops.</u>
83.11	BOKSER Greg	Intensive winter grazing	Oppose	Amend definition to June to August.
89.43	BRENTLEIGH Family Trust	Intensive winter grazing		This needs defined better. Wintering of stock is an animal welfare issue. ES cannot determine production of a property based on the stock wintered.
93.12	Broadacres Ltd	Winter grazing	Amend	Amend the definition of Winter Grazing to June to September.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
97.6	Brunel Peaks Ltd	Intensive winter grazing	Amend	Exclude pasture from intensive winter grazing definition.
128.2	CHITTOCK Andrew & Diane	Intensive winter grazing		We would like some better definitions to the following: intensive winter grazing – no specific definitions in regard to stock units per hectare or size of mobs. Crops to be defined as brassicas and beets only.
145.4	CLELAND JA & DM & SJ Partnership	Intensive winter grazing	Oppose	Amend the definition to include brassicas and beet only and exclude pasture.
150.7	CLIFFORD Mervyn & Judy-Ann	Intensive winter grazing	Oppose	Definition of winter grazing crops should specify brassicas and beets.
153.6	Coalbrook Partnership	Intensive winter grazing	Oppose	Forage crops should be defined as brassicas or beets.
155.11	Coasthaven Farms Ltd AND Paterson Gavara Trust	Intensive winter grazing	Oppose	That the definition excludes lighter animals such as sheep, calves and heifers.
159.6	COLLING Leigh	Intensive winter grazing	Oppose	Give definition on what is intensive winter grazing for stock class and stocking rate.
160.10	COLLING Megan	Intensive winter grazing		No clear definition of intensive winter grazing given. No stock class or stocking rate.
163.6	CONLAN Eddie & Judy Family Trust	Intensive winter grazing	Amend	Rule needs to better define the term “intensive winter grazing”, suggest something like “Intensive winter grazing is where stock are grazed in concentrated numbers on pasture or on winter feed crops in cultivated areas.”
164.5	Conlan Farming	Intensive winter grazing	Amend	Define winter grazing to a meaning of crops grown e.g. swedes for sole purpose of winter feed.
171.2	Cosy Nook Farms 2007 Ltd	Intensive winter grazing		Amend to include a clearer definition of intensive winter grazing.
179.10	CROOKS Jonathan Ross & Sarah Jane	Intensive winter grazing		A clear definition of ‘intensive winter grazing’ is required specifying whether cereal crops are included.
190.24	DairyNZ	Intensive winter grazing	Support Amend	Amend to: Grazing of stock between May and September (inclusive) on <del>forage crops</del> <u>in-situ brassica and root vegetable crops.</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
202.5	DICKSON Brent Gordon	Intensive winter grazing	Amend	Intensive winter grazing is grazing of farm stock on crops grown in cultivated areas for winter feed, and any areas significantly pugged by grazing animals over winter.
203.5	DICKSON Bruce John	Intensive winter grazing	Amend	Amend to “Grazing of farm stock on crops sown specifically for winter feed, and any area where a large concentration of animals in a small area results in significant soil pugging”.
205.38	Dillon Ag Ltd (Chris Dillon)	Intensive winter grazing		This needs defined better. Wintering of stock is an animal welfare issue. ES cannot determine production of a property based on the stock wintered.
206.38	Dillon Ag Ltd (Rochelle Dillon)	Intensive winter grazing		This needs defined better. Wintering of stock is an animal welfare issue. ES cannot determine production of a property based on the stock wintered.
233.33	DYSON Valerie &Glyn	Intensive winter grazing	Amend	Amend to:.....on forage <u>brassica and beet</u> crops. Clearly define what intensive winter grazing is and what classes of livestock Rule 23 applies to.
234.2	EADE Bruce	Intensive winter grazing	Amend	Winter should start from May 20 <sup>th</sup> till Sept 20 <sup>th</sup> .
234.3	EADE Bruce	Intensive winter grazing	Amend	Define ‘Intensive’.
237.4	Eaton Willow Lodge (Brent Eaton)	Intensive winter grazing	Oppose	Intensive Winter Grazing - This needs more clarification as to what 'Intensive' means. e.g. Different crops yield differently therefore intensity changes
238.5	Eaton Willow Lodge (Derek Eaton)	Intensive winter grazing	Oppose	This needs more clarification as to what 'Intensive' means. e.g. different crops yield differently therefore intensity changes.
239.5	Eaton Willow Lodge (Paul & Elaine Eaton)	Intensive winter grazing	Oppose	This needs more clarification as to what 'Intensive' means e.g. different crops yield differently therefore intensity changes.
251.4	Euan Crump Farming Co Ltd	Intensive winter grazing	Amend	Give sheep own intensive grazing classification.
258.32	Eyre Creek Ltd	Intensive winter grazing	Support in part	Amend Intensive Winter grazing to: ‘Grazing of stock between June and August on brassicas and beets’
264.15	FarmRight Ltd	Intensive winter grazing	Amend	Retain but include a definition of forage crop.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.113	Federated Farmers of NZ (Southland Province)	Intensive winter grazing	Support in part	Amend the definition of ‘intensive winter grazing’ as follows:  Grazing of stock between <del>May</del> June and <del>September</del> August (inclusive) on <del>forage crops</del> <u>brassicas and beets</u> .
277.61	Fonterra Co-operative Group Ltd	Intensive winter grazing	Oppose in part	Amend the definition of “Intensive Winter Grazing” to clearly exclude grazing on grass from the definition, or alternatively insert a definition of forage crops so as to exclude pasture.
281.4	Four Legged Farming Ltd	Intensive winter grazing	Amend	Revert to the “old” definition of: “Grazing of stock from 1 May to 30 September on fodder crops or pasture to the extent that the grazing resulting in significant de-vegetation. Usually associated with break feeding behind temporary electric fencing. Significant de-vegetation is the removal or heavy damage to vegetation - caused by stock access or grazing - resulting in the exposure of large areas of bare ground or soil compaction.”
295.7	Gardyne Agriculture Ltd (Fred Gardyne)	Intensive winter grazing	Oppose Amend	Intensive winter grazing should be defined as brassicas and beets only and exclude cereals and grains.
299.24	GARDYNE John	Intensive winter grazing	Oppose	Intensive winter grazing of stock between June and August (inclusive) on brassicas or beets.
300.19	GARDYNE Jonathan	Intensive winter grazing	Oppose	Winter grazing period of 1 <sup>st</sup> May – 30 <sup>th</sup> September is two months too long. What is the definition of intensive winter grazing and associated crops (stocking rate)?
313.13	GILLESPIE Maria	Intensive winter grazing	Amend	A definition of what constitutes a forage crop needs to be linked to more effects based.
315.2	Glen Echo Station Partnership	Intensive winter grazing	Oppose	The definition is too vague, need to clarify.
344.9	Hall Ag Ltd (Glenda Hall)	Intensive winter grazing	Oppose Amend	Should be defined as brassicas and beets only. Needs to exclude Cereals and grass.
345.9	Hall Ag Ltd (John Hall)	Intensive winter grazing	Oppose Amend	Should be defined as brassicas and beets only. Needs to exclude Cereals and grass.
362.10	Hedgehope Grazing Ltd	Intensive winter grazing	Oppose in part	Retain definition of intensive grassing as the grazing of fodder crops by stock and that it does not include the grazing of pasture.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
365.14	HEENAN M D and D W	Intensive winter grazing	Amend	Amend definition of Intensive Winter grazing to exclude stubble and all grass wintering.
367.2	HEISS Raphael	Intensive winter grazing	Oppose	Exclude cereal crops form definition.
371.7	HENDERSON Tracy	Intensive winter grazing	Oppose	Amend timeframes to June and July.
374.4	High Country Farms Ltd	Intensive winter grazing	Amend	Consider June to August (inclusive). A definition of intensive needs to be come up with on a stock unit per hectare basis.
389.10	HORRELL P J & J M	Intensive winter grazing		Consider giving more discretion to the farm plan for the management and area of winter grazing.
402.22	HUNT Alistair & Bernadette	Intensive winter grazing	Amend	Amend definition to: Grazing stock between <del>June and August</del> <u>May and September</u> (inclusive)...
415.5	IRWIN Doug	Intensive winter grazing	Oppose	Remove sheep.
416.4	IRWIN Robyn	Intensive winter grazing	Amend	Amend definition to exclude pasture.
418.4	J McLean Farming Ltd	Intensive winter grazing		Clarify whether intensive winter grazing is solely for dairy cows or does it include sheep/beef. Is there a number of animals used to define intensive?
425.9	Jedburgh Station Ltd	Intensive winter grazing	Oppose	Sheep should be excluded from the intensive winter grazing definition.
429.8	JOYCE Nathan J & Julie L	Intensive winter grazing	Oppose	Sheep should be excluded from the definition
444.9	KING Henry	Rule 23(iv)	Amend	Define 'intensive' winter grazing.
464.38	Landpro Ltd	Intensive winter grazing	Support	No changes to the definition are sought, and clarification that the definition excludes pasture is sought
486.8	M Gardyne Ltd	Intensive winter grazing	Amend	Intensive winter grazing should be defined as grazing crops with a yield greater than 8,000kg DM/ha. Grazing sheep on green fed oats that weigh 4,000 kg DM/ha is not intensive winter grazing.
487.10	M K H Farming Ltd	Intensive winter	Amend	I propose the PSWLP provide a stocking rate threshold for each stock class to be included in

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		grazing		this definition.
494.6	MACKINTOSH Alistair	Intensive winter grazing	Amend	Sheep should not come under the plan. Remove all reference to sheep in the definition of intensive winter grazing. Amend definition of intensive winter grazing to run from June to August
506.9	MARSHALL R C	Intensive winter grazing	Amend	Amend definition for winter grazing to June to August.
518.16	MCDONALD Stuart & HALDER Robyn	Intensive winter grazing		Please specifically state that 'intensive winter grazing' does not include grazing on grass pasture, only forage crops.
525.7	MCINTYRE Hayden	Intensive winter grazing	Oppose	Winter should be three calendar months.
528.4	MCKAY A S & D E	Intensive winter grazing		Define the word "intensive".
538.9	MCKENZIE Hayden	Intensive winter grazing	Oppose Amend	Cattle have a five-month restriction on winter grazing as they tend to damage the soil structure more than sheep. Sheep farms to have a three-month period. Cereal crops should be excluded from the definition if not grazed over the winter period.
551.5	MCPHAIL Glen	Intensive winter grazing	Amend	Further define intensive winter grazing, could it be kg/day/ha?
553.14	McPhelzo Trust (C G & M P Pullar)	Intensive winter grazing	Oppose	Amend the timeframe in the definition of intensive winter grazing to capture the actual climatic conditions. Exclude cereal crops from the intensive forage crop definition.
554.15	McPhelzo Trust (Z, E & P Pullar)	Intensive winter grazing	Oppose	Amend the timeframe in the definition of intensive winter grazing to capture the actual climatic conditions.
555.17	MCRAE Daryl & Ruth	Intensive Winter Grazing	Amend	Intensive Winter Grazing be from June to August inclusive.
570.23	MILLER R L & S J Farm Trust	Intensive winter grazing	Oppose	Define as 'grazing between June and August on Brassicas and Beet'.
587.4	MOUAT James	Intensive winter grazing		Winter grazing should only include brassica.
603.21	Nithdale Station	Intensive winter grazing		I propose a definition of Intensive Winter Grazing: The grazing of stock between May and September (inclusive) on areas that have been cleared of permanent pasture through spraying

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				or mechanical cultivation and sown with any feed where the ground remains bare after grazing.
616.12	O'CONNELL Elizabeth	Intensive winter grazing		Require clarification around: <ul style="list-style-type: none"> <li>-“intensive” with respect to each stock class and age e.g. cows compared with ewes or calves</li> <li>- “intensive” with respect to a stocking rate;</li> <li>- confinement of the word “forage” to brassica and beet crops, excluding cereal crops.</li> </ul>
628.9	PATERSON Stephanie	Intensive winter grazing	Amend	Please consider this carefully and clarify.
642.10	PREBBLE Lynden	Intensive winter grazing	Oppose Amend	Sheep should be excluded from this rule.
643.10	PREBBLE Sandra	Intensive winter grazing	Oppose Amend	As an alternative I propose sheep should be excluded from this rule. The 20/50 ha rule should be amended to be 20/50 ha maximum for farms up to 350 ha and then a maximum of 15% of the farm area for farms over 350 ha.
645.9	PRICE William	Intensive winter grazing		Amend timeframe to June to August.
661.48	Ravensdown Ltd	Intensive winter grazing	Neutral	Ravensdown seeks a review of the definition with intention of making it consistent current practice in Southland.
681.27	Rockytommy Farming Ltd	Intensive winter grazing	Amend	Retain.
682.21	Rokenwai Farming Ltd	Intensive winter grazing	Amend	Retain.
687.3	Roseneath Dairies	Intensive winter grazing	Amend	Need to better define the term, suggest something like: “intensive winter grazing means where stock are fed in large numbers in small areas or on crops specifically grown as winter feed crops such as brassicas, fodder beets, cereals etc.”
689.9	ROSS Keith	Intensive winter grazing	Oppose	Amend definition for winter grazing from June to August.
690.9	ROSS Warren	Intensive winter grazing	Oppose	Clarity around what intensive winter grazing is.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
691.9	Rossland Farming Ltd	Intensive winter grazing	Oppose	Clarity around what intensive winter grazing is.
696.6	RUDDENKLAU I & J	Intensive winter grazing	Support	Winter should be defined from start of June until mid August (10 weeks)
700.7	Rural Solutions Ltd	Intensive winter grazing		The definition of “intensive winter grazing” and how it applies to land holdings need a much more definitive explanation. The definition of forage crops needs expanding. I presume you mean brassica and beet varieties.
724.6	SHIRLEY Wayne & Gaye	Intensive winter grazing	Support	Retain.
728.8	Slope Point Farms Ltd	Intensive winter grazing	Oppose	Amend definition to a percentage of the stock on the property and amend the duration to delete September.
744.6	Southern Farms NZ Ltd (Gene Bryce)	Intensive winter grazing	Amend	Brassica/bulb crops. (Pasture, cereals etc.) not included.
752.238	Southland Fish & Game Council	Intensive winter grazing	Support	Retain.
759.32	Springlands Group Ltd	Intensive winter grazing	Support	No changes are sought to this definition.
760.6	St Patricks Farms Ltd	Intensive winter grazing	Support Amend	Expand and clarify the definition in the Glossary.
766.14	STEVENS Brendon	Intensive winter grazing	Amend	Intensive winter grazing needs better defined i.e. intensive winter grazing means where stock are fed in large numbers on small areas or on specifically grown forage crops such as fodder beet, brassicas, cereals etc.
769.5	STEVENSON G V & B P	Intensive winter grazing	Amend	Include a stocking rate. Winter is 3 months, clarify re summer crops.
770.4	STEWART Family Trust (David Stewart)	Intensive winter grazing	Amend	Decrease the time frame to the following dates: 1 June to 31 August.
775.12	Stoney Creek Station Ltd	Intensive winter grazing		Amend definition to June to August.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
783.7	STRINGER Joe	Intensive winter grazing		Define intensive winter grazing? Is this animal's per acre/hectare/metre/cubic metre? What is an acceptable rate? What empirical evidence do you have to support this? What is the stocking rate of ducks in the Invercargill gardens ponds and what is the faecal runoff?
787.7	SUTHERLAND Richard	Intensive winter grazing	Oppose	Intensive grazing needs to be more defined.
789.3	SWNEY Garry & Beverley	Intensive winter grazing	Amend	Define and get more specific on what is meant by "Intensive Winter Grazing, and exclude grass as a fodder in May, August and September.
802.38	The 254 Partnership & Gerken Family Trust	Intensive winter grazing		This needs defined better. Wintering of stock is an animal welfare issue. ES cannot determine production of a property based on the stock wintered.
803.51	The Fertiliser Association of NZ	Intensive winter grazing	Support	Retain.
807.11	The Terraces Ltd	Intensive winter grazing		Amend definition to June to August.
808.6	THOMAS Alison & Roger	Intensive winter grazing	Amend	Sheep should be excluded as far less impact on soils as long as active land management. Active land management plan for sheep.
824.12	Tulloch Farm Glendhu Ltd	Intensive winter grazing	Oppose	Amend the definition of Winter Grazing to June to September.
825.13	Tulloch McNab Transport Ltd	Intensive winter grazing	Oppose	Amend definition for winter grazing to June to August.
832.141	VAN GOOL Raewyn	Intensive winter grazing		Definition of intensive winter grazing needs clarification. Needs to be clarified that the 20/50ha rule refers to grazing on 20/50ha of forage crop only, not including pasture. Definition needs to be amended to June to September.
843.6	Waikaia Plains Ltd	Intensive winter grazing	Amend	Expand and clarify the definition in the glossary. Particularly interested in the effects on winter grassing of beef cattle at high density but low grazing duration i.e. six hours per grazing period.
868.38	Wilkins Farming Ltd	Intensive winter grazing	Support in part	'Grazing of stock between June and August on brassicas and beets' AS IWG is a winter activity.
878.6	WILSON Douglas	Intensive winter grazing	Oppose	Exclude cereal crops.
880.81	WILSON Shannon	Intensive winter grazing		Clarify the definition of "intensive winter grazing".

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
883.6	WING Darren & Jenny	Intensive winter grazing	Amend	Have an earlier end date in mid August.

#### Definitions – Interference effects

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.239	Southland Fish & Game Council	Interference effects	Support	Retain.

#### Definitions – Intermittent waterbodies

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.240	Southland Fish & Game Council	Intermittent waterbodies	Support	Retain.

#### Definitions – Land application system

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.241	Southland Fish & Game Council	Land application system	Support	Retain.

#### Definitions – Landfill

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.242	Southland Fish & Game	Landfill	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			

### Definitions – Landholding

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
7.7	AdBest Partnership	Landholding		No clear definition has been given for landholding.
25.39	Ardel Dairies Ltd	Landholding	Oppose	Amend definition to refer to titles.
26.16	Ardoyne Farm Dairys	Landholding	Amend	Amend definition of landholding.
47.33	Balfour, Wendonside & Waikaia Group	Landholding		Clarity of the definition of landholding and how it is intended to apply to common occupiers which have different farming operations.
54.21	Bayswater Dairy Ltd	Landholding	Oppose	Amend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
89.44	BRENTLEIGH Family Trust	Landholding		This term should be removed and replaced with “Title”.
129.4	CHRISTEY Anthony	Landholding		Clarify wording “landholding”.
220.20	Drylands Farming Ltd	Landholding	Oppose Amend	In regards to Rules 23 and 35, consideration should be made for those who have multiple adjoining titles and provisions made within the rulings to allow for sustainable and economical farming operations.
221.20	DRYSDALE Family Trust	Landholding	Oppose Amend	In regards to Rules 23 and 35, consideration should be made for those who have multiple adjoining titles and provisions made within the rulings to allow for sustainable and economical farming operations.
264.16	FarmRight Ltd	Landholding	Oppose	Amend the definition of land holding so that farms that are adjoining and/or owned by a common occupier are not classed as a single unit or allow farm businesses to prove that they have multiple businesses under the one landholding i.e. per dairy shed. Alternatively, the wording to be changed from landholding to farm.
277.62	Fonterra Co-operative Group Ltd	Landholding	Oppose in part	Amend the definition of “Landholding” as follows: (a) For land subject to the Land Transfer Act 1952, land in: (i) a single certificate of title; or



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p>(ii) two or more adjoining certificates of title, with a common occupier- <u>or</u></p> <p>(iii) <u>two or more certificates of title with a common occupier operated as a single milking platform</u></p> <p>(b) For land not subject to the Land Transfer Act 1952, all contiguous land last acquired under one instrument of conveyance and occupied by a common occupier.</p>
339.19	GUNN Olivia	Landholding	Oppose	We recommend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
361.19	HBG AgriLimited	Landholding		Amend the definition of a landholding so that it is not inequitable for landholders with contiguous landholdings.
365.15	HEENAN M D and D W	Landholding	Amend	Amend definition for clarity to exclude adjoining ownership, but run separately.
386.21	Hopcroft Farms Ltd	Landholding	Oppose	I recommend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
387.23	HORRELL Andrew Russell	Landholding	Amend	Recognise the complexity of land ownership in Southland and that it is difficult to accurately determine who has management control of land parcels from the ownership.
434.7	Kauana Dairy Ltd & Taffy Ltd	landholding	Oppose	Clarify definition of 'landholding'.
464.39	Landpro Ltd	Landholding	Amend	We seek that either definition of landholding is amended to reflect our comments in the column to the left, or that the rules which reference landholding clarify that they apply to each separate farming unit and not to one landholding. We do not support the definition of landholding within the PSWLP on the basis that we believe that two neighbouring (adjacent) properties with a common occupier may be operated as separate farming units and therefore should not be combined under the one Rule. Therefore, each farm unit should be treated as a standalone landholding.
476.5	Lochhead Holdings Ltd	Landholding		Request that the definition of Landholding is reconsidered.
477.11	Longwood Properties Ltd	Landholding	Oppose	We suggest that (a)(ii) be removed from the definition of Landholding in the glossary.
482.27	Lower Aparima Catchment Group	Landholding	Oppose	We recommend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
532.5	MCKEE M & C Family Partnership	Landholding		Clarify the definition of Landholding.
564.20	Mid-Aparima Catchment	Landholding	Oppose	We recommend the definition of landholding be revised so that it is not inequitable for

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Group			landholders with contiguous landholdings.
583.29	MOSEBY Ryan	Landholding	Amend	Definition needs to apply equal ruling to all individual farming businesses regardless of land being contiguous.
596.4	My Farm Ltd & Associated Farms & Kerr Road Dairy Ltd	Landholding	Oppose Amend	Amend definition of landholding incorporating appropriate management units.
667.13	Riverfield Farms Ltd	Landholding	Amend	Revise the definition of landholding to include titles within a FMU and applies only between FMU's. the FMU's need to be divided into Upper, Mid and Lower.
681.28	Rockytommy Farming Ltd	Landholding	Oppose	Clarify the definition of landholding and how it is intended to apply to common occupiers which have different farming operations.
681.29	Rockytommy Farming Ltd	Landholding	Oppose	Clarify the definition of landholding and how it is intended to apply to common occupiers which have different farming operations.
682.22	Rokenwai Farming Ltd	Landholding	Oppose	Clarify the definition of landholding and how it is intended to apply to common occupiers which have different farming operations.
752.243	Southland Fish & Game Council	Landholding	Support	Retain.
759.33	Springlands Group Ltd	Landholding	Oppose	Clarity of the definition of landholding and how it is intended to apply to common occupiers which have different farming operations.
761.21	STALKER Hanna & Callum	Landholding	Oppose	The definition of a landholding should be revised so that it is not inequitable for landholders with contiguous landholdings.
798.14	TEMPLETON Luke	Landholding		I recommend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
799.16	TEMPLETON Peter	Landholding	Oppose	The definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
802.39	The 254 Partnership & Gerken Family Trust	Landholding		This term should be removed and replaced with "Title".
813.12	Tihaka Farms	Landholding	Oppose	We suggest that (a)(ii) be removed from the definition of Landholding in the glossary.
842.12	Waihoaka Holdings Ltd	Landholding	Oppose	We suggest that (a)(ii) be removed from the definition of Landholding in the glossary.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
861.33	WHITE John Copeland	Landholding	Oppose	Provide definition for landholding. We recommend the definition of a landholding be revised so that it is not inequitable for landholders with contiguous landholdings.
865.11	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Landholding	Amend	Define the meaning of 'landholding' so that if a person/entity is the owner of more than one property/farm than each property/farm is treated as an 'individual' landholding.
877.76	WILSON Aaron	Landholding	Oppose	The definition of "Landholding" in the glossary of the Water and Land Plan needs to be simplified.
880.82	WILSON Shannon	Landholding	Oppose	The definition of "landholding" in the glossary of the W&L plan needs to be simplified.
894.5	YOUNG Robert	Landholding		Define "landholdings" so that separate blocks of land can be dealt with individually.

#### Definitions – Lawfully established

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.244	Southland Fish & Game Council	Lawfully established	Support	Retain.

#### Definitions – Leaching

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.245	Southland Fish & Game Council	Leaching	Support	Retain.

#### Definitions – Light fuel

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.246	Southland Fish & Game	Light fuel	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			

### Definitions – Loading

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.247	Southland Fish & Game Council	Loading	Support	Retain.

### Definitions – Low flow

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.248	Southland Fish & Game Council	Low flow	Support	Retain.

### Definitions – Mahinga kai

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.249	Southland Fish & Game Council	Mahinga kai	Support	Retain.
797.62	Te Runanga o Ngāi Tahu	Mahinga kai	Support in part	Amend the definition of ‘Mahinga kai’ to include: <u>Mahinga kai is central to the Ngāi Tahu ki Murihiku way of life and a principal component of environmental management. Mahinga kai is about places, ways of doing things, and resources that sustain people.</u>

### Definitions – Main stem

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.250	Southland Fish & Game Council	Main stem	Support	Retain.

### Definitions – Maintenance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
449.43	KiwiRail Holdings Ltd (KiwiRail)	Maintenance	Support	Retain.
449.44	KiwiRail Holdings Ltd (KiwiRail)	Maintenance	Support	Retain.
664.28	Real Journeys Ltd	Maintenance		A broader definition of maintenance is required to provide removal of accumulated gravel from such structures as slipway rails.
752.251	Southland Fish & Game Council	Maintenance	Support	Retain.

### Definitions – Mauri

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.252	Southland Fish & Game Council	Mauri	Support	Retain.

**Definitions – Mean seasonal high groundwater**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.253	Southland Fish & Game Council	Mean seasonal high groundwater	Support	Retain.

**Definitions – Median flow**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.254	Southland Fish & Game Council	Median flow	Support	Retain.

**Definitions – Method**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.255	Southland Fish & Game Council	Method	Support	Retain.

**Definitions – Minimum flow**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.256	Southland Fish & Game Council	Minimum flow	Support	Retain.

### Definitions – Mitigate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.257	Southland Fish & Game Council	Mitigate	Support	Retain.

### Definitions – Mobile toilet

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.258	Southland Fish & Game Council	Mobile toilet	Support	Retain.

### Definitions – Modified watercourse

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
198.9	DIACK Hugh	Modified watercourse	Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
247.40	Environment Southland	Modified or artificial watercourse - Bed	Amend	<u>Bed of a modified or artificial watercourse: the space of land which the waters of the watercourse cover at its fullest flow without overtopping its banks.</u>
678.10	ROBINSON Jeffrey	Modified water course	Oppose	Amend the rule to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
679.10	ROBINSON Michael	Modified watercourse	Oppose	Include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
752.259	Southland Fish & Game Council	Modified	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		watercourse		
804.4	TIPPETT Christie	Modified watercourse	Oppose Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.

### Definitions – Mooring

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.260	Southland Fish & Game Council	Mooring	Support	Retain.

### Definitions – National Park

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.261	Southland Fish & Game Council	National Park	Support	Retain.

### Definitions – Natural character values

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.262	Southland Fish & Game Council	Natural character values	Support	Retain.



**Definitions – Natural mean flow**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.263	Southland Fish & Game Council	Natural mean flow	Support	Retain.

**Definitions – Natural state waters (water quantity)**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.29	Real Journeys Ltd	Natural state waters		Provide parameters for definition of natural state waters.
752.264	Southland Fish & Game Council	Natural state waters (water quantity)	Support	Retain.

**Definitions – Natural state waters (water quality)**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.30	Real Journeys Ltd	Natural state waters (water quality)		Provide parameters for definition of natural state waters.
752.265	Southland Fish & Game Council	Natural state waters (water quality)	Support	Retain.

## Definitions – Natural wetland

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.113	BYTHELL Jesse	Natural wetland		I seek that the definition of naturally occurring wetland be expanded to include those wetlands which might have intact soil or hydrological functions but whose native plant community is modified or absent (that is, a wetland which may rate as ecologically important even if it is degraded or modified).
220.21	Drylands Farming Ltd	Natural wetland	Support Amend	Duck ponds should also be included in the list of Exclusions.
221.21	DRYSDALE Family Trust	Natural wetland	Support Amend	Duck ponds should also be included in the list of Exclusions.
265.114	Federated Farmers of NZ (Southland Province)	Natural wetland	Support	Retain.
371.8	HENDERSON Tracy	Natural wetland/wetland	Oppose	Expressly exclude wet pasture, or where water temporarily ponds after rain or pasture containing patches of rushes from definition of wetland or natural wetland.
390.44	Horticulture NZ	Natural wetland	Oppose in part	Amend the definition of natural wetland to add to the exclusions: <u>sediment control measures or artificial wetlands</u> .
402.23	HUNT Alistair & Bernadette	Natural wetland	Support	Retain.
612.8	NZ Fire Service Commission	Natural wetland	Support	Retain.
721.6	SHEARING Dean	Natural wetland	Amend	More clarification on what a natural wetland is.
752.266	Southland Fish & Game Council	Natural wetland	Support Amend	Amend the definition of natural wetland as follows: <p><b>“Natural wetland</b></p> <p>Includes permanently or intermittently wet areas, shallow water and land margins that support a natural ecosystem of plants and animals that are adapted to wet conditions, <u>including in the beds of lakes and rivers, the coastal marine area (e.g. saltmarsh), and groundwater-fed wetlands (e.g. springs) but excludes</u>. <b>Natural wetlands do not include:</b></p> <ul style="list-style-type: none"> <li>a) wet pasture, damp gully heads, or where water temporarily ponds after rain or pasture containing patches of rushes;</li> <li>b) effluent ponds;</li> <li>c) artificial storage facilities and detention dams;</li> <li>d) artificial watercourses such as conveyance and drainage canals;</li> </ul>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				e) <u>water storage</u> reservoirs for firefighting, domestic or community water supply; and f) engineered soil conservation structures.  [See also definition of “ <b>wetland</b> ” and “ <b>regionally significant wetland</b> ”] A definition of “regionally significant wetland” is proposed below.
877.77	WILSON Aaron	Natural wetland		The Water and Land plan needs to define; The definition of “natural wetlands” with regards to Rule 70.
880.83	WILSON Shannon	Natural wetland	Support in part	The W&L plan needs to define: “natural wetlands” with regard to this rule [Rule 70].

### Definitions – Non-point source discharges

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.267	Southland Fish & Game Council	Non-point source discharges	Support	Retain.
803.52	The Fertiliser Association of NZ	Non-point source discharges	Support	Retain.

### Definitions – Nohoanga

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.268	Southland Fish & Game Council	Nohoanga	Support	Retain.

### Definitions – Nutrient

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.269	Southland Fish & Game Council	Nutrient	Support	Retain.
803.53	The Fertiliser Association of NZ	Nutrient	Support	Retain.

### Definitions – On-site wastewater system

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
330.20	Gore District Council, Invercargill City Council and Southland District Council	On-site wastewater system	Oppose Amend	The definition of ‘On-site wastewater system’ be amended as follows: <b>On-site Wastewater System</b> The collection, treatment and disposal/reuse of wastewater from <del>an</del> individual homes or commercial facilities on the same <u>landholding property</u> as it is generated. <del>For the purposes of this definition, wastewater is limited to toilet wastes and wash water from kitchens, bathrooms and laundries.</del>
752.270	Southland Fish & Game Council	On-site wastewater system	Support	Retain.

### Definitions – Organism

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.271	Southland Fish & Game Council	Organism	Support	Retain.

**Definitions – Perched water**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.272	Southland Fish & Game Council	Perched water	Support	Retain.

**Definitions – Periphyton**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.273	Southland Fish & Game Council	Periphyton	Support	Retain.

**Definitions – Pest species**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.274	Southland Fish & Game Council	Pest species	Support	Retain.

**Definitions – pH**

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.275	Southland Fish & Game Council	pH	Support	Retain.

## Definitions – Pit toilet

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.276	Southland Fish & Game Council	Pit toilet	Support	Retain.

## Definitions – Physiographic zone

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.20	Beef + Lamb NZ	Physiographic zone	Oppose Amend	Delete.
264.17	FarmRight Ltd	Physiographic zone	Oppose in part	We seek a clearer definition of physiographic zones in relation to intensive winter grazing.
265.115	Federated Farmers of NZ (Southland Province)	Physiographic zone	Oppose	Delete.
661.49	Ravensdown Ltd	Physiographic zone	Support in part	Ravensdown an amend to the definition of Physiographic zone to read: <u>“A physiographic zone represents areas of the landscape with common attributes that influence water quality, such as climate, topography, geology and soil type. Zones differ in the way sediment, microbes, and nutrients such as nitrogen and phosphorus accumulate and are transferred through the soil, aquifers and into waterbodies.</u>  The zones <del>as</del> <u>are</u> depicted on Map Series 4: Physiographic Zones <u>and individually described in the Plan, Part A, pages 18 – 21.”</u>
752.277	Southland Fish & Game Council	Physiographic zone	Support	Retain.
803.54	The Fertiliser Association of NZ	Physiographic zone	Amend	Amend the definition of ‘Physiographic zones’ is amended as follows: <b>Physiographic zone</b> <u>A physiographic zone represents areas of the landscape with common attributes that influence water quality, such as climate, topography, geology and soil type. Zones differ in the way sediment, microbes (e.g. E.coli) and nutrients, such as nitrogen and phosphorus, build up and</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<p><u>move through the soil, aquifers (areas of groundwater) and into our rivers and streams.</u></p> <p>The zones <del>as</del> <u>are</u> depicted on Map Series 4: Physiographic Zones and individually described in the Plan, Part A, pages 18 - 21.</p>

#### Definitions – Place of assembly

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.278	Southland Fish & Game Council	Place of assembly	Support	Retain.

#### Definitions – Point source discharges

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.279	Southland Fish & Game Council	Point source discharges	Support	Retain.
803.55	The Fertiliser Association of NZ	Point source discharges	Support	Retain.

#### Definitions – Potable water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.280	Southland Fish & Game Council	Potable water	Support	Retain.

### Definitions – Potentiometric head

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.281	Southland Fish & Game Council	Ptentiometric head	Support	Retain.

### Definitions – Q95

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.102	Director-General of Conservation	Q95	Oppose in part	Amend the definition of Q95 to read This is the <u>naturalised</u> flow that is exceeded 95% of the time during the year.
752.282	Southland Fish & Game Council	Q95	Oppose in part	Amend the definition of Q95 to provide: “This is the <u>naturalised</u> flow that is exceeded 95% of the time during the year.”

### Definitions – Radius of influence

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.283	Southland Fish & Game Council	Radius of influence	Support	Retain.

### Definitions – Raw sewage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.284	Southland Fish & Game Council	Raw sewage	Support	Retain.



Definitions – Reasonable mixing zone

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
330.21	Gore District Council, Invercargill City Council and Southland District Council	Reasonable mixing zone	Oppose Amend	<p>The definition for ‘Reasonable Mixing Zone’ is amended as follows:</p> <p><b>Reasonable Mixing Zone</b></p> <p>When determining the size of the zone of reasonable mixing, minimise the size of the area where the relevant water quality standards are breached. The zone shall not be larger than:</p> <ul style="list-style-type: none"> <li>a. for river and artificial watercourse locations with flowing water present at all times: <ul style="list-style-type: none"> <li>i. no longer than 10 times the width of the wetted channel or 200 metres along the longest axis of the zone (whichever is the lesser), and</li> <li>ii. occupies no greater than two-thirds of the wetted channel width at the estimated Q95 for that location;</li> </ul> </li> <li>b. for river and artificial watercourse locations, with intermittent flows, no longer than 20 metres at times of flow and 0 metres at no flow;</li> <li>c. when within a drinking water supply site identified in Appendix J, 0 metres; <del>or</del></li> </ul> <p><u>A distance determined as appropriate through resource consent application.</u></p>
750.26	Southland District Council	Reasonable Mixing Zone	Amend	<p>Amend wording as follows:</p> <p>“When determining the size of the zone of reasonable mixing, minimise the size of the area where the relevant water quality standards are breached. The zone shall not be larger than:</p> <ul style="list-style-type: none"> <li>(a) for river and artificial watercourse locations with flowing water present at all times; <ul style="list-style-type: none"> <li>(i) no longer than 10 times the width of the wetted channel or 200 metres along the longest axis of the zone (whichever is the lesser), and</li> <li>(ii) occupies no greater than two-thirds of the wetted channel width at the estimated 7 DMALF for that location; <u>or</u></li> </ul> </li> <li>(b) For river and artificial watercourse locations, with intermittent flows, no longer than 20 metres at times of flow and 0 metres at no flow; <u>or</u></li> <li>(c) When within a drinking water supply site identified in Appendix O, 0 metres; <del>or</del></li> </ul> <p><u>(d) A distance determined as appropriate through a consent application.”</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.285	Southland Fish & Game Council	Reasonable mixing zone	Support	Retain.
877.78	WILSON Aaron	Reasonable mixing zone		Definition of what a “reasonable mixing zone” may look like in the real world.
895.61	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Reasonable mixing zone	Amend	<p><b>Amend as follows:</b></p> <p><b>Reasonable Mixing Zone</b></p> <p><del>When determining the size of the zone of reasonable mixing, minimise the size of the area where the relevant water quality standards are breached. The zone shall not be larger than:</del></p> <p>(a) for river and artificial watercourse locations with flowing water present at all times:</p> <p>(i) no longer than 10 times the width of the wetted channel or 200 metres along the longest axis of the zone (whichever is the lesser), and</p> <p>(ii) <del>occupies</del> no greater than two-thirds of the wetted channel width at the estimated Q95 for that location;</p> <p>(b) for river and artificial watercourse locations, with intermittent flows, no longer than 20 metres at times of flow and 0 metres at no flow;</p> <p>(c) when within a drinking water supply <del>site</del> <u>protection zone</u> identified in Appendix J, 0 metres.</p>

### Definitions – Receiving waters

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.286	Southland Fish & Game Council	Receiving waters	Support	Retain.

### Definitions – Reconstruction

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.287	Southland Fish & Game	Reconstruction	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			

### Definitions – Recorded historic heritage site

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
372.36	Heritage NZ	Recorded Historic Heritage Sites	Amend	Amend the definition of ‘Recorded historic heritage site’ as follows: Sites recorded on the New Zealand Heritage List/Rārangī Kōrero <del>or on the New Zealand Archaeological Association (NZAA) Site Recording Scheme</del> , or a historic heritage site, tree or building listed in an operative <u>or proposed</u> district <u>or regional</u> plan. Include information in the Water and Land Plan about how owners and/or applicants are to access information about the location and nature of NZAA recorded sites.
449.45	KiwiRail Holdings Ltd (KiwiRail)	Recorded Historic Heritage Sites		KiwiRail’s first preference is that the definition be deleted. In the alternative that Council retain a definition, KiwiRail seek that the definition be amended to reflect the concerns raised in the KiwiRail submission, including that the terms “historic heritage” and “recorded historic heritage sites” are used consistently to avoid confusion;
752.288	Southland Fish & Game Council	Recorded Historic Heritage Sites	Support	Retain.

### Definitions – Reticulated systems

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
411.37	Invercargill City Council	Reticulated systems	Oppose	Amend the definition to read as follows: Means the Territorial Authority owned and operated systems for distribution of water, and collection and conveyance to discharge point of stormwater and sewage.
752.289	Southland Fish & Game Council	Reticulated systems	Support	Retain.
895.62	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Reticulated systems	Support	Retain.

### Definitions – Rip rap

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.290	Southland Fish & Game Council	Rip rap	Support	Retain.

### Definitions – Riparian area/margins

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
190.25	DairyNZ	Riparian area/margins	Support Amend	Amend to provide a more comprehensive definition of “riparian area/margins” should be provided.
752.291	Southland Fish & Game Council	Riparian area/margins	Support	Retain.

### Definitions – RMA

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.292	Southland Fish & Game Council	RMA	Support	Retain.

### Definitions – Septage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.293	Southland Fish & Game Council	Septage	Support	Retain.

### Definitions – Sewage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.294	Southland Fish & Game Council	Sewage	Support	Retain.

### Definitions – Silage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
233.34	DYSON Valerie &Glyn	Silage	Support	Retain.
752.295	Southland Fish & Game Council	Silage	Support	Retain.

### Definitions – Silage leachate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.296	Southland Fish & Game Council	Silage leachate	Support	Retain.

### Definitions – Silage storage facility

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.297	Southland Fish & Game Council	Silage storage facility	Support	Retain.
877.79	WILSON Aaron	Silage storage facility		Seek further clarification on the definition of a “silage storage facility”.
880.84	WILSON Shannon	Silage storage facility		Seek further clarification on the definition of a “silage storage facility”.

### Definitions – Significant de-vegetation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
390.45	Horticulture NZ	Significant de-vegetation	Oppose	Delete.
752.298	Southland Fish & Game Council	Significant de-vegetation	Support	Retain.
803.56	The Fertiliser Association of NZ	Significant de-vegetation	Support in part Amend	Amend the definition of ‘significant de-vegetation’ is amended as follows: <b>Significant de-vegetation</b> Means any farming activity that results in the exposure of bare ground and/or pugging of the soil <u>on the bed or banks of a waterbody.</u>

### Definitions – Sludge

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
220.22	Drylands Farming Ltd	Sludge	Oppose	Sludge is not a solid as it still contains water. Re-define.
221.22	DRYSDALE Family Trust	Sludge	Oppose	Sludge is not a solid as it still contains water. Re-define.
752.299	Southland Fish & Game Council	Sludge	Support	Retain.

### Definitions – Soil infiltration surface

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.300	Southland Fish & Game Council	Soil infiltration surface	Support	Retain.

### Definitions – Spring fed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.301	Southland Fish & Game Council	Spring fed	Support	Retain.

### Definitions – Stock/stock class/stocking rate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.21	Beef + Lamb NZ	Stock	Support in part Amend	Amend the definition of Stock as follows: Farm animals kept for use or profit such as horses, dairy cows, cattle, deer, pigs, goats and sheep.
278.3	FORDYCE Gary	Stock class	Amend	Better definition of stock class e.g. Sheep – lambs, ewes; Cattle – cows, calves in Intensive Winter Grazing Rule.
752.302	Southland Fish & Game Council	Stock	Support	Retain.
815.5	Timpany Investments Ltd	stocking rate		We suggest that a definition of stocking rate be improved from a simple ‘cows per hectare’ to a ‘live weight per hectare’ measure.

### Definitions – Stock crossing

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.303	Southland Fish & Game Council	Stock crossing	Support	Retain.

## Definitions – Stormwater

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.304	Southland Fish & Game Council	stormwater	Support	Retain.
895.63	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Stormwater	Support	Retain.

## Definitions – Subsurface drainage system

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
258.33	Eyre Creek Ltd	Sub-surface drainage systems	Support in part	Amend sub surface drainage systems: delete the word ‘mole’
265.116	Federated Farmers of NZ (Southland Province)	Subsurface drainage systems	Oppose in part	Amend definition of ‘subsurface drainage systems’ as follows:  An artificial permeable subsurface conduit constructed for the purposes of draining agricultural soil water/moisture. An installed subsurface drainage system includes tile, <del>mole</del> , concrete and clay drains, wooden box drains and plastic subsurface drainage pipes. Stormwater systems, drainage by use of sumps, and foul water drainage systems are not included in this definition.
402.24	HUNT Alistair & Bernadette	Subsurface drainage system	Amend	Amend definition to remove mole drains.
570.24	MILLER R L & S J Farm Trust	Subsurface drainage system	Oppose	Delete ‘mole’ from the definition.
752.305	Southland Fish & Game Council	Subsurface drainage system	Support	Retain.
803.57	The Fertiliser Association of NZ	Subsurface drainage system	Support	Retain.
868.39	Wilkins Farming Ltd	Sub surface drainage systems	Support in part	Delete the word ‘mole’.



## Definitions – Surface waterbody

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.22	Beef + Lamb NZ	Surface waterbody	Oppose Amend	Amend the definition of surface waterbody to: Freshwater or geothermal water in: <ul style="list-style-type: none"> <li>• a river, <del>or lake</del>, stream, <u>but excludes water in an artificial watercourse, that is deeper than 15 cm and wider than 1 metre; or</u></li> <li>• <u>A lake or pond that is Xm<sup>2</sup> [use an industry agreed size]</u> or</li> <li>• <u>a wetland</u></li> </ul> or any part thereof that is not located within the coastal marine area <del>but excludes water in an artificial watercourse</del>
189.55	Dairy Holdings Ltd	Surface waterbody		Amend definition of “surface waterbody” in Glossary: Freshwater or geothermal water in a river, lake, stream, pond, or <u>natural</u> wetland or any part thereof that is not located within the coastal marine area but excludes water in an artificial watercourse <u>or modified watercourse.</u>
247.41	Environment Southland	Surface waterbody	Amend	Delete the definition of “surface waterbody” and wherever the term occurs in the text of the plan, replace it with “a lake, river, natural wetland, artificial watercourse or modified watercourse”, or whatever combination of these terms is appropriate for particular rule.
390.46	Horticulture NZ	Surface waterbody	Oppose in part	Add to the exclusion in the definition of ‘surface water body’ by adding ‘ <u>or subsurface drainage system.</u> ’
752.306	Southland Fish & Game Council	Surface waterbody	Support	Retain.
797.63	Te Runanga o Ngai Tahu	Surface waterbody	Oppose	Amend to read: Surface Waterbody – Freshwater or geothermal water in a river, lake, stream, pond, or wetland or any part thereof that is not located within the coastal marine area <del>but excludes water in an artificial watercourse</del> <u>and includes artificial watercourse where they are connected to any river, lake, stream, pond or wetland.</u>

### Definitions – Tangata whenua

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.307	Southland Fish & Game Council	Tangata whenua	Support	Retain.

### Definitions – Total groundwater allocation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.308	Southland Fish & Game Council	Total groundwater allocation	Support	Retain.
895.64	Z Energy, BP Oil NZ & Mobil Oil NZ (Oil Companies)	Total groundwater allocation	Amend	Amend as follows: Total groundwater allocation The total volume of water allocated at the date a resource consent application for a new take is lodged. This includes the water that is allocated through current resource consents, the water that is proposed to be taken under consent applications that have been lodged and the additional water proposed to be taken by the consent applicant. It excludes <u>temporary construction dewatering activities</u> and the stream depletion effect of each groundwater take greater than 2 litres per second with a direct, high or moderate degree of hydraulic connection in accordance with Policy 23 “Stream Depletion Effects”.

### Definitions – Total surface water allocation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.309	Southland Fish & Game Council	Total surface water allocation	Support	Retain.

### Definitions – Toxicity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.310	Southland Fish & Game Council	Toxicity	Support	Retain.

### Definitions – Unconfined aquifer

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.311	Southland Fish & Game Council	Unconfined aquifer	Support	Retain.

### Definitions – Untreated animal effluent

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.312	Southland Fish & Game Council	Untreated animal effluent	Support	Retain.

### Definitions – Unwanted organisms

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
390.47	Horticulture NZ	Unwanted organisms	Support	Retain.
752.313	Southland Fish & Game Council	Unwanted organisms	Support	Retain.

### Definitions – Values

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.314	Southland Fish & Game Council	Values	Support	Retain.

### Definitions – Vegetation flood debris

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.315	Southland Fish & Game Council	Vegetation flood debris	Support	Retain.

### Definitions – Waahi taonga

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.316	Southland Fish & Game Council	Waahi taonga	Support	Retain.

### Definitions – Waahi tapu

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.317	Southland Fish & Game Council	Waahi tapu	Support	Retain.

## Definitions – Water demand management strategy

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
390.48	Horticulture NZ	Water demand management strategy	Support	Retain.
752.318	Southland Fish & Game Council	Water demand management strategy	Support	Retain.

## Definitions – Wetland

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
62.23	Beef + Lamb NZ	Wetland	Oppose	Delete.
209.49	DIPROSE Dave	Wetland		Define a wetland.
233.35	DYSON Valerie &Glyn	Wetland	Oppose	Delete.
247.42	Environment Southland	Wetland - bed	Amend	Include definitions as follows: <u>Bed of a wetland:</u> <u>the land within a wetland boundary.</u>
258.34	Eyre Creek Ltd	Wetland	Support in part	Amend Wetland to exclude intermittently wet pasture.
265.117	Federated Farmers of NZ (Southland Province)	Wetland	Oppose	Delete.
371.9	HENDERSON Tracy	Wetland	Oppose	Expressly exclude wet pasture, or where water temporarily ponds after rain or pasture containing patches of rushes from definition of wetland or natural wetland.
390.49	Horticulture NZ	Wetland	Oppose in part	Include the list of exclusions in the definition of natural wetland in the definition of wetland.
402.25	HUNT Alistair & Bernadette	Wetland	Oppose	Delete.
570.25	MILLER R L & S J Farm Trust	Wetland	Oppose	Delete 'intermittently wet pasture' from the definition.
752.319	Southland Fish & Game	Wetland	Support	Retain.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Council			
868.40	Wilkins Farming Ltd	Wetland	Support in part	Exclude intermittently wet pasture.
877.80	WILSON Aaron	Wetland	Oppose in part	Define “wetland” within the context of this policy (policy 33).
880.85	WILSON Shannon	Wetland	Oppose in part	Define “wetland” within the context of this policy (policy 33).

### Definitions – Wetland boundary

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.103	Director-General of Conservation	Wetland boundary	Oppose	Delete the definition of wetland boundary.
752.320	Southland Fish & Game Council	Wetland boundary	Oppose	Delete the definition of “wetland boundary” in its entirety.

### Proposed New Definitions

#### Active bed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
277.63	Fonterra Co-operative Group Ltd	Active bed	Oppose in part	Include a definition of “active bed” as follows: <u>“Means the bed of a river, artificial watercourse or modified watercourse that is permanently or intermittently flowing and where the bed is predominantly unvegetated and comprises sand, gravel, boulders or similar material.”</u>
752.321	Southland Fish & Game Council	Active bed		Insert the following definition: <u>‘Active bed’ means the bed of a river that is intermittently flowing and where the bed is predominantly unvegetated and comprises sand, gravel, boulders or similar material.</u>

## Activities

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.31	Real Journeys Ltd	Activities		Include a definition for “activities”.

## Avoid/ed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
26.17	Ardoyne Farm Dairys	Avoided		New definition of avoided.
339.20	GUNN Olivia	Avoided	Amend	Definition required for “avoided” Policy 16(1)(b).
386.22	Hopcroft Farms Ltd	Avoided	Amend	Provide definitions for: “avoided” “fully mitigated” Policy 16 1.(b),
798.15	TEMPLETON Luke	Avoided		Provide a definition for ‘avoided’.
799.17	TEMPLETON Peter	Avoided		Provide a definition for avoided.
861.34	WHITE John Copeland	Avoided	Amend	Provide definition for ‘avoided’.

## Banks

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
594.2	MUNRO Ronald & Kathryn	Banks	Amend	Better definition in relation to “banks” – slope running toward waterbody is 4 degrees (or whatever).

## Base flow

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.322	Southland Fish & Game Council	Base flow		Insert the following definition: <u>“Base flow has the same meaning as Q95, i.e. this is the naturalised flow that is exceeded 95% of the time during the year.”</u>

## Bed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
230.2	DYER Cyril	Bed		Add definition of “bed” of a lake or river
247.43	Environment Southland	Bed of wetland/modified and artificial watercourse	Amend	Include definitions as follows: <b>Bed of a wetland</b> the land within a wetland boundary. <b>Bed of a modified or artificial watercourse</b> the space of land which the waters of the watercourse cover at its fullest flow without overtopping its banks.
365.16	HEENAN M D and D W	Bed	Amend	Include a definition, and or diagram of bed within the glossary.

## Best practicable option

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
48.42	Ballance Agri-Nutrients	Best practicable option	Support (in principle)	A definition for best practicable option is provided within the pSW&LP as follows: <u>“best practicable option, in relation to a discharge of a contaminant or an emission of noise, means the best method for preventing or minimising the adverse effects on the environment having regard, among other things, to—</u> <u>(a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and</u> <u>(b) the financial implications, and the effects on the environment, of that option when compared with other options; and</u> <u>(c) the current state of technical knowledge and the likelihood that the option can be successfully applied”</u>
803.58	The Fertiliser Association of NZ	Best practicable option		Include a definition of ‘Best practicable option’ as follows: <b>Best practicable option, in relation to a discharge of a contaminant or an emission of noise:</b> <u>means the best method for preventing or minimising the adverse effects on the environment having regard, among other things, to—</u> <u>(a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and</u> <u>(b) the financial implications, and the effects on the environment, of that option when compared with other options; and</u> <u>(c) the current state of technical knowledge and the likelihood that the option can be</u>



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>successfully applied</u> ”

### Calving pad

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
31 25.40	Ardel Dairies Ltd	Calving pad	Oppose	New definition needed for calving pad.
47.34	Balfour, Wendonside & Waikaia Group	Calving pad	Oppose	We seek the ES propose and include definitions of calving pad in the PSWLP.
487.11	M K H Farming Ltd	Calving pad	Amend	Amend by providing definition of calving pad.
569.20	MILLER R J Trust	Calving pad		Include new definition of calving pad.
759.34	Springlands Group Ltd	Calving pad	Oppose	We seek that ES propose and include a definition of calving pad.

### Certified Nutrient Management Adviser

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
661.50	Ravensdown Ltd	Certified Nutrient Management Adviser		Ravensdown seeks for Council to introduce a new definition as follows: <u>“Certified Nutrient Management Adviser: Means a Nutrient Management Adviser certified under the Nutrient Manager Adviser Certification Programme Ltd.”</u>
803.59	The Fertiliser Association of NZ	Certified Nutrient Management Adviser	Amend	Include a definition of ‘Certified Nutrient Management Adviser’ as follows: <b><u>Certified Nutrient Management Adviser:</u></b> <u>means a Nutrient Management Adviser certified under the Nutrient Manager Adviser Certification Programme Ltd.</u>

## Close proximity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.41	Ardel Dairies Ltd	Close proximity	Oppose	Define “close proximity”.
188.4	Dairy Farms NZ Ltd	Close proximity	Amend	New definition for “Close Proximity” (Policy 15.1(a)).
264.18	FarmRight Ltd	Close proximity	Amend	Provide a clearer indication of what ‘close proximity is.
331.11	GRANT J J & J L	Close proximity	Oppose	Define close proximity.
333.6	Greenbush Farms Ltd	Close proximity	Amend	Clearly define the term close proximity.
339.21	GUNN Olivia	Close proximity	Amend	Definition required for “close proximity” Policy 16(1)(a).
386.23	Hopcroft Farms Ltd	Close proximity	Amend	Provide definition for “close proximity” see Policy 16 1.(a)
545.7	MCLEOD Emma	Close proximity	Amend	Provide a definition for “close proximity” in terms of standard measurement units.
621.7	Otara Dairies Ltd	Close proximity		Clearly define ‘close proximity’.
740.8	South Coast Dairy Ltd	Close proximity	Amend	That you clearly define the term “close proximity”.
766.15	STEVENS Brendon	Close proximity	Amend	Define what “close proximity” is.
768.13	STEVENSON Audrey	Close proximity	Oppose	Define “close proximity”.
777.13	STRATFORD Chris & Lynsey	Close proximity	Neutral	Define "close proximity".
798.16	TEMPLETON Luke	Close proximity		Provide a definition for close proximity.
799.18	TEMPLETON Peter	Close proximity		Provide a definition for close proximity.
861.35	WHITE John Copeland	Close proximity	Amend	Provide definition for close proximity.
871.7	WILLANS Murray & Tarn	Close proximity	Amend	Clarify what “close proximity” means. Is this intended to mean within 1km, 10km or 20km of a sensitive waterbody?
888.10	WOOLHOUSE K A & J A	Close proximity	Oppose	Define ‘close’ proximity.

### Coastal marine area

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
37.4	BAIRD Jeremy	Coastal marine area		Define lakes or coastal marine areas to lakes and wetlands that have been named.
38.4	BAIRD M G & R J	Coastal marine area		Define lakes or coastal marine areas to lakes and wetlands that have been named.
798.17	TEMPLETON Luke	Coastal marine area		Provide a definition for 'coastal marine area'.
799.19	TEMPLETON Peter	Coastal marine area		Provide a definition for coastal marine area.

### Common occupier

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
277.64	Fonterra Co-operative Group Ltd	Common occupier		Include a definition of "common occupier" that ensures that properties with the same legal owner/occupier are not regarded as a single landholding where they are operated as separate business enterprises.

### Conspicuous change to colour and clarity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.323	Southland Fish & Game Council	Conspicuous change to colour and clarity		Insert the following definition: <u>"<b>Conspicuous change to colour and clarity of the receiving waters</b> means a 20% or greater change in the visual clarity of the receiving waters at the downstream edge of the reasonable mixing zone."</u>

## Contaminant

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
47.35	Balfour, Wendonside & Waikaia Group	Contaminant	Amend	Include the definition of Contaminant: <u>“Includes any substance (including gases, odorous compounds, liquids, solids, and micro-organisms) or energy (excluding noise) or heat, that either by itself or in combination with the same, similar or other substances, energy or heat –</u> <u>(a) when discharged into water, changes or is likely to change the physical, chemical or biological condition of water; or</u> <u>(b) when discharged onto or into land or into air, changes or is likely to change the physical, chemical or biological condition of the land or air onto or into which it is discharged.”</u>
214.19	Donald Farm	Contaminant		New definition.
220.23	Drylands Farming Ltd	Contaminant	Amend	No definition in glossary. Legal definition requested.
221.23	DRYSDALE Family Trust	Contaminant	Amend	No definition in glossary. Legal definition requested.
558.16	MCRAE Natalie	Contaminant		Add a definition of contaminant.
759.35	Springlands Group Ltd	Contaminant	Amend	Include the definition of Contaminant: <u>“Includes any substance (including gases, odorous compounds, liquids, solids, and micro-organisms) or energy (excluding noise) or heat, that either by itself or in combination with the same, similar or other substances, energy or heat –</u> <u>(a) when discharged into water, changes or is likely to change the physical, chemical or biological condition of water; or</u> <u>(b) when discharged onto or into land or into air, changes or is likely to change the physical, chemical or biological condition of the land or air onto or into which it is discharged.”</u>

## Critical infrastructure

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
330.22	Gore District Council, Invercargill City Council and Southland District Council	Critical infrastructure	Amend	Insert a new definition consistent with the RPS as follows:  <u><b>Critical infrastructure</b></u> <u>Infrastructure that provides services which, if interrupted, would have a significant effect on the wellbeing and health and safety of people and communities and would require reinstatement,</u>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				<u>and includes all strategic facilities.</u>

### Deep drainage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.116	Aratiatia Livestock Ltd	Deep drainage	Support	ES needs to define “deep drainage”. We submit that before ES imposes a blanket “oxidising” description to our property, the soil should be reassessed.

### Discharge

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
558.17	MCRAE Natalie	Discharge		Add a definition of discharge.

### Disturbance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.81	WILSON Aaron	Disturbance		The Water and Land plan needs to define; The definition of “disturbance” with regards to Rule 70.
880.86	WILSON Shannon	Disturbance	Support in part	The W&L plan needs to define: “disturbance”.

### Dry land habitat

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
209.50	DIPROSE Dave	Dry land habitat		Need good definitions around dry land habitats, rivers, wetland, lakes.

### Ecosystem services

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
210.104	Director-General of Conservation	Ecosystem services		Include the definition of ecosystem services as agreed for the proposed Southland Regional Policy Statement.

### Efficient allocation and use

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
390.50	Horticulture NZ	Efficient use		Include a definition of 'efficient allocation and use' as including economic, technical and dynamic efficiency.

### Ephemeral waterway

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
666.32	Rimu Grasslands Ltd & Leicester Downs Ltd	Ephemeral waterway		Include a definition for ephemeral waterway.

### Existing wetland

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
147.11	CLEMENT Karina	Existing wetland		Define 'existing wetland'.

### Farming/dairy farming/farming activities

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
7.8	AdBest Partnership	Dairy farming		No clear definition of dairying has been found. I would strongly advise to formulate one.
47.36	Balfour, Wendonside &	Dairy farming	Amend	A legal definition is requested.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Waikaia Group			
166.3	COPELAND Pete & Tanya	Dairy farming		The term “dairy farming” needs to be limited to the activities on a dairy platform related solely to lactating cows. The term should not indirectly relate to the grazing of calves, rising 2 year olds or breeding bulls on support land for a dairy farm.
188.5	Dairy Farms NZ Ltd	Dairy farming	Amend	New definition for “dairy farming”.
265.118	Federated Farmers of NZ (Southland Province)	Dairy farming	Support in part	Add a definition of ‘dairy farming’ to the Proposed Plan that restricts dairy farming to the grazing of land for the purpose of producing milk by lactating animals.
273.4	Flaxwood South	Dairy farming		Define dairying.
277.65	Fonterra Co-operative Group Ltd	Dairy farming		Include the following definition of “dairy farming of cows” - <u>“The farming of milking cows on the dairy platform”</u>
281.5	Four Legged Farming Ltd	Farming	Amend	Define farming. Suggest it be something along the lines of “Farming includes any commercial use of a rural landholding.”
339.22	GUNN Olivia	Dairy farming	Amend	Definition required for dairy farming.
348.9	HAMILTON Blair	Farming		Clarify - how do you define Farming?
361.20	HBG AgriLimited	Dairy farm/farming		Include a definition of Dairy farm/dairy farming within the glossary. The definition should be restricted to the grazing of land for the purpose of producing milk/or by lactating animals.
362.11	Hedgehope Grazing Ltd	Farming		Define farming.
362.12	Hedgehope Grazing Ltd	Dairy farm		Please give clarification to the definition of a dairy farm, and how lease agreements will be handled.
386.24	Hopcroft Farms Ltd	Dairy farming	Amend	Provide definitions for: Dairy Farming.
390.51	Horticulture NZ	Farming activity		Include a definition for farming activity: <u>Any land and auxiliary buildings used for the production (but not processing) of primary products including agricultural, pastoral, horticultural and forestry products).</u>
464.40	Landpro Ltd	Dairy farming	Oppose	We seek a legal definition of ‘dairy farming’ to be included in the plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
482.28	Lower Aparima Catchment Group	Dairy farming		Provide definition for dairy farming.
663.10	RD Agritech Ltd	Farming/dairy farming	Amend	Amend the definitions, to include definitions for: (a) Farming (b) dairy farming
664.32	Real Journeys Ltd	Farming/farming activities		Define farming or farming activities.
670.5	ROBB Tony & Jill Family Trust	Dairy farming		Define dairying.
712.37	Seaview Trust & Oraka Farms Ltd	Dairy farming		Recommend defining dairy farming to 'the grazing of land for the purposes of producing milk from lactating animals'.
752.324	Southland Fish & Game Council	Farming activity	Support Amend	Include a definition of "farming activity" in the Glossary of the pWLP.
759.36	Springlands Group Ltd	Dairy farming	Amend	A legal definition is requested.
798.18	TEMPLETON Luke	Dairy farming		Provide a definition for dairy farming.
799.20	TEMPLETON Peter	Dairy farming		Provide a definition for dairy farming.
832.142	VAN GOOL Raewyn	Farming		Farming is not defined in the plan nor in the glossary. This needs to be corrected. Arable, cereal cropping etc. horticulture, vegetable growing, floriculture needs to be captured as well. All these need to require a land management plan.
861.36	WHITE John Copeland	Dairy farming		Provide definition for dairy farming.

### Feed lot/feed pad/stand off pad/dairy platform

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.42	Ardel Dairies Ltd	Feed pad	Oppose	New definition needed for feed pad.
47.37	Balfour, Wendonside & Waikaia Group	Feed pad	Oppose	We seek the ES propose and include definitions of feed pad in the PSWLP.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
208.9	DILLON M J & S E	Feed lot	Oppose	Add a definition of a feed lot.
220.24	Drylands Farming Ltd	Feed pad	Amend	We seek a legal definition.
220.25	Drylands Farming Ltd	Stand off pad	Amend	We seek a legal definition.
221.24	DRYSDALE Family Trust	Feed pad	Amend	We seek a legal definition.
221.25	DRYSDALE Family Trust	Stand off pad	Amend	We seek a legal definition.
277.66	Fonterra Co-operative Group Ltd	Dairy platform		Include the following definition of “dairy platform” - <u>“The area of land devoted to feeding milking cows on a daily basis during the milking season”.</u>
487.12	M K H Farming Ltd	Feed pad	Amend	Amend by providing definition of feed pad.
569.21	MILLER R J Trust	Feed pad		Include new definition of feed pad.
575.4	MITCHELL Keith	Feed lot		Add a definition of feed lot.
759.37	Springlands Group Ltd	Feed pad	Oppose	We seek that ES propose and include a definition of feed pad.
828.10	Twin Farm Ltd	Feedlot	Oppose	Add a definition of a feed lot.

### Fodder/forage crop

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
26.18	Ardoyne Farm Dairys	Forage crops		New definition of forage crop.
36.1	BAIRD Allan	Forage crops	Amend	Clearly define the differences between different forage crops; For example Fodder beet high yield Brassicas medium yield Brassica or cereal catch crop low yield The risks associated with these different crops.
37.5	BAIRD J J	Forage crops		Clearly define the differences between different forage crops. For example fodder beet high yield, brassicas medium yield, brassica or cereal catch crop low yield. The risks associated with these different crops.
38.5	BAIRD M G & R J	Forage crops	Amend	Clearly define the differences between different forage crops. For example fodder beet high yield, brassicas medium yield, brassica or cereal catch crop low yield. The risks associated with

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				these different crops.
47.38	Balfour, Wendonside & Waikaia Group	Forage crops	Amend	We propose that ES provides a definition of forage crop.
51.2	Barkman Farming Ltd	Forage crop		Clearly define forage crops.
54.22	Bayswater Dairy Ltd	Fodder crop	Oppose	A definition of fodder crop is needed. This should not include grass.
118.14	Carmyllie Farm	Forage crops		Definition of forage crops currently includes anything that is intensively grazed in the winter period (should this specify only brassicas and beet?).
146.3	Clemcorp Ltd	Forage crops		Add definition of forage crop
168.5	COPLAND R D & N J Family Trust	Forage crop	Amend	A forage crop needs to be defined as a crop excluding permanent pasture grown specifically for feeding agricultural animals from May until September.
170.3	CORCORAN Martin Peter	Fodder crops	Amend	Fodder crops should be defined as beets and brassicas only.
179.11	CROOKS Jonathan Ross & Sarah Jane	Forage crops		A definition for 'forage crops', needs to be included in the Plan. We propose that forage crops are defined as Brassicas and Beet.
195.6	DAVIE Stuart	Forage crops		Define forage crops - beets and brassicas?
208.10	DILLON M J & S E	Forage crops	Amend	Add a definition of "forage crops".
220.26	Drylands Farming Ltd	Forage crops	Amend	Include a forage crops definition
221.26	DRYSDALE Family Trust	Forage crops	Amend	Include a forage crops definition
222.6	DUFF Bradon	Forage crop	Amend	Amend the term of intensive winter grazing to Forage Crop meaning brassica and beet.
233.36	DYSON Valerie &Glyn	Forage crops		Clearly define what forage crop is.
234.4	EADE Bruce	Forage crops	Amend	Winter forage crops to be fodder beet, kale, swede and turnips only.
258.35	Eyre Creek Ltd	Forage crops	Support in part	Forage Crop: 'defined as brassica and beet crops'
264.19	FarmRight Ltd	Forage crops	Amend	Include a definition of forage crop.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
294.7	Gardyne Agriculture Ltd (Duncan Gardyne)	Forage crops	Oppose Amend	Need to define what a forage crop currently includes. Should be defined as brassicas and beets only. Needs to exclude cereals and grass.
299.25	GARDYNE John	Forage crops		Forage crops – kale, swedes, turnips, beet.
323.6	Glenshe Trust	Forage crops	Amend	Definition of ‘forage crop’ should only include brassicas and beets and not pasture.
339.23	GUNN Olivia	Forage crops		A definition of fodder crop is needed. This should not include grass.
361.21	HBG AgriLimited	Fodder crop		A definition of fodder crop is needed. This should not include grass.
365.17	HEENAN M D and D W	Forage crops	Amend	Include a definition of forage crops, which exclude stubble.
371.10	HENDERSON Tracy	Forage crops	Oppose	Define “forage crops” as kale and beet.
377.4	HODGE Lynda	Forage crops	Oppose	The Glossary needs to list what is classed as a Forage Crop.
386.25	Hopcroft Farms Ltd	Fodder crop		A definition of fodder crop is needed. This should not include pasture. Also the plan seems to use ‘forage’ in some instances and ‘fodder’ in others. ES needs to define the difference (if in fact there is any) or consistently use the same wording.
387.24	HORRELL Andrew Russell	Forage crops	Amend	Provide definition of forage crop. Suggested definition; Spring sown full season crop of a species suitable for a single grazing e.g. swedes, kale, fodder beet. For the purpose of grazing during the winter months.
389.11	HORRELL P J & J M	Forage crops		Define forage crops.
464.41	Landpro Ltd	Fodder/forage crops	Oppose	ES provides a definition of fodder crop and/or forage crop and/or consistently refers to either one or the other throughout the PSWLP.
482.29	Lower Aparima Catchment Group	Fodder/forage crop		A definition of fodder crop is needed. This should not include pasture. We think this should be clarified or explicit in the plan. The plan seems to use ‘forage’ in some instances and ‘fodder’ in others. ES needs to define the difference (if in fact there is any) or consistently use the same wording.
487.13	M K H Farming Ltd	Forage crops	Amend	Amend this to include a definition of “what is forage crop”.
545.8	MCLEOD Emma	Forage crops		Provide definition for ‘forage crop’.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
554.16	McPhelzo Trust (Z, E & P Pullar)	Forage crops	Oppose	Exclude cereal crops from the intensive forage crop definition.
556.13	MCRAE Joe	Fodder/forage crops		Define forage crops.
557.13	MCRAE Matt	Forage crops		Provide definition for forage crops.
564.21	Mid-Aparima Catchment Group	Fodder crop		A definition of fodder crop is needed. This should not include grass.
567.4	MILLER Geoffrey	Forage/winter crop	Amend	Define winter crops to mean brassicas e.g. swedes, kale etc.
570.26	MILLER R L & S J Farm Trust	Forage crops	Oppose	Define as brassica and beet crops.
575.5	MITCHELL Keith	Forage crops	Amend	Add a definition of “forage crops”.
625.4	Parawa Ltd	Fodder/forage crops	Amend	Need to be able to grow chicory, plantain and cereal crops. Need to be separated from brassica crops.
627.8	PATERSON Ross	Fodder/forage crops	Amend	Define forage crops as swedes and beets.
628.10	PATERSON Stephanie	Forage crops	Amend	Define forage crops as swedes and beets etc.
659.7	Rathfriland Ltd	Fodder crops	Amend	Define exactly what crops are included as winter grazing e.g. swedes, kale, fodder beet.
666.33	Rimu Grasslands Ltd & Leicester Downs Ltd	Fodder/forage crops		Add a fodder crop to definition.
681.30	Rockytommy Farming Ltd	Fodder/forage crop	Amend	We propose that Environment Southland provides a definition of forage crop.
682.23	Rokenwai Farming Ltd	Fodder/forage crops		We propose that Environment Southland provides a definition of forage crop.
759.38	Springlands Group Ltd	Forage crops	Amend	We propose that ES provides a definition of forage crop.
761.22	STALKER Hanna & Callum	Forage crops	Oppose	A definition of fodder crop is needed that does not include grass.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
771.17	STEWART Family Trust (Trevor Stewart)	Forage crops	Amend	I think that cereal crops should be specifically excluded from the forage crop definition.
774.9	STEWART Vanessa	Forage crops	Amend	I think that cereal crops should be specifically excluded from the forage crop definition.
782.6	STRINGER Gay	Forage/winter crop	Oppose	Define what winter crops means – suggest it be brassicas and beets.
787.8	SUTHERLAND Richard	Forage crops	Oppose	Identification of crops as forage or cereal needs to be clearly defined.
798.19	TEMPLETON Luke	Fodder crops		A definition of fodder crop is needed. This should not include grass.
799.21	TEMPLETON Peter	Fodder crops		A definition of fodder crop is needed. This should not include grass.
799.22	TEMPLETON Peter	Forage crops		Provide a definition for forage crop.
802.40	The 254 Partnership & Gerken Family Trust	Forage crops		What is the definition of forage crops. The plan does not allow for those who grow the likes of fodder beet for lifting and feeding elsewhere. Forage oats and regrowth crops should be left out of wintering.
828.11	Twin Farm Ltd	Forage crops	Amend	Clarify the definition of forage crop. Forage crops should be crops especially planted for winter grazing, and should specifically exclude cereal crops.
832.143	VAN GOOL Raewyn	Forage crops		Define forage crops.
851.5	WEIR Darren	Forage crops	Oppose	New definition - define forage crop as chow, fodder beet, swedes and turnips.
853.5	WEIR Victoria	Forage crops	Oppose	Define forage crops.
861.37	WHITE John Copeland	Fodder/forage crops		A definition of fodder crop is needed.
865.12	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Fodder crops		A list of fodder crops that fall into this ruling.
868.41	Wilkins Farming Ltd	forage crop	Support in part	‘defined as brassicas and beet crops’.

## Fully mitigated

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
26.19	Ardoyne Farm Dairys	Fully mitigated		New definition of fully mitigated.
47.39	Balfour, Wendonside & Waikaia Group	Fully mitigated		Define 'fully mitigated' or remove the term from the plan.
190.26	DairyNZ	Fully mitigated	Support Amend	Clarify the term "fully mitigated".
259.20	F D Enterprises Ltd	Fully mitigated	Oppose in part	Definition of 'fully mitigated' or removal of the term from the plan all together.
264.20	FarmRight Ltd	Fully mitigated	Amend	Define the term "fully mitigated" or remove the term from the plan altogether.
339.24	GUNN Olivia	Fully mitigated	Amend	Definition required for "fully mitigated" Policy 16(1)(b).
386.26	Hopcroft Farms Ltd	Fully mitigated	Amend	Provide definitions for: "avoided" .. "fully mitigated" Policy 16 1.(b),
464.42	Landpro Ltd	Fully mitigated	Oppose in part	Definition of 'fully mitigated' or removal of the term all together.
604.15	Nokomai Station Ltd	Fully mitigated	Oppose in part	Fully mitigated is not defined in the plan, we seek a definition of 'fully mitigated.'
759.39	Springlands Group Ltd	Fully mitigated	Oppose in part	Definition of 'fully mitigated' or removal of the term from the plan all together.
766.16	STEVENS Brendon	Fully mitigated	Amend	Define or remove the term "fully mitigated".
798.20	TEMPLETON Luke	Fully mitigated		Provide a definition for 'fully mitigated'.
799.23	TEMPLETON Peter	Fully mitigated		Provide a definition for fully mitigated.
861.38	WHITE John Copeland	Fully mitigated	Amend	Provide definition for 'fully mitigated'.

## Good management practice

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
36.2	BAIRD Allan	Good management practice	Oppose	Clearly define what general good management practices are that needs to be implemented in the management plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
38.6	BAIRD M G & R J	Good management practices	Oppose	Clearly define what general good management practices are that needs to be implemented in the management plan.
47.40	Balfour, Wendonside & Waikaia Group	Good Management Practice		Include a definition of Good (environmental) management practice for clarity for the community.
48.43	Ballance Agri-Nutrients	Good management practice	Support in part	<p>Insert a definition for ‘good management practice’ is provided within the Glossary of Terms, such as:</p> <p><b><u>Good Management Practice</u></b>  <u>Practices, procedures or the use of tools, which are effective at achieving the desired performance while providing for environmental responsibility. Good management practice evolves through time and results in continuous improvement as new information, technology and awareness of particular issues are developed and disseminate.</u></p> <p><u>Support is given to identifying these as;</u>  <u>“Industry Agreed Good Management Practices” being the practices described in the document entitled ‘Industry-agreed Good Management Practices relating to water quality’ - dated September 2015.</u></p>
189.56	Dairy Holdings Ltd	Good management practice		<p>Include definition of “good management practice”:</p> <p><u>Good management practice refers to those practices identified in the <i>Industry-Agreed Good Management Practices Relating to Water Quality</i><sup>12</sup> and updated versions of this guide; or other good management practice standards that may be issued by Environment Southland.</u></p>
259.21	F D Enterprises Ltd	Good (environmental) management practice	Support Amend	Include a definition of Good (environmental) management practice) for clarity for the community. This may involve providing a list of examples of good environment practices (GMPs) for a range of farming activities to give farmers a greater clarity.

<sup>12</sup> Published by the Canterbury Matrix of Good Management project in September 2015. Available at: [http://ecan.govt.nz/publications/General/Industry\\_Agreed\\_GMPs\\_A5\\_Version2\\_Sept2015\\_FINAL.pdf](http://ecan.govt.nz/publications/General/Industry_Agreed_GMPs_A5_Version2_Sept2015_FINAL.pdf)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
264.21	FarmRight Ltd	Good (environmental) management practice		We seek that ES propose a definition of Good (environmental) management practice) for clarity for the community. Alternatively, this may involve referring to the GMPs that are outlined on the SRC website.
464.43	Landpro Ltd	Good (environmental) management practice)	Oppose	We seek that ES propose a definition of Good (environmental) management practice) be included in the PSWLP for clarity for the community. We suggest a disclaimer or advice note is included in the ES GMP factsheets for clarity.
569.22	MILLER R J Trust	Good management practice		ES propose a definition of “good (environmental) management practise” for clarity for the community.
661.51	Ravensdown Ltd	Good management practice		<p>Ravensdown seeks that the following definition of Good Management Practice be included in the Plan:</p> <p><b><u>Good Management Practice</u></b>  <u>Practices, procedures or use of tools which are effective at achieving the desired performance while providing for environmental responsibility. Good management practice evolves through time and results in continuous improvement as new information, technology and awareness of particular issues are developed and disseminate.</u></p> <p><u>Support is given to identifying these as:</u>  <u>“Industry Agreed Good Management Practices ” being the practices described in the document</u>  <u>entitled ‘Industry-agreed Good Management Practices relating to water quality’ - dated September 2015.</u></p>
752.325	Southland Fish & Game Council	Good management practice	Support Amend	<p>Include the following definition of good management practice:</p> <p><b><u>“Good management practice</u></b>  <u>Practices, procedures or tools (including rules) that are effective at achieving the desired performance while providing for desired environmental outcomes. Good management practice evolves through time and results in continuous improvement as new information, technology and awareness of particular issues are developed and disseminated.”</u></p>
759.40	Springlands Group Ltd	Good (environmental		We seek that ES propose a definition of Good (environmental) management practice) for clarity



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
		management practice)		for the community.
803.60	The Fertiliser Association of NZ	Good management practice	Amend	<p>Include a definition of ‘Good Management Practice’ as follows:</p> <p><b><u>Good Management Practice</u></b></p> <p><u>Practices, procedures or use of tools which are effective at achieving the desired performance while providing for environmental responsibility. Good management practice evolves through time and results in continuous improvement as new information, technology and awareness of particular issues are developed and disseminate.</u></p> <p><u>Support is given to identifying these as:</u></p> <p><u>“Industry Agreed Good Management Practices” being the practices described in the document entitled ‘Industry-agreed Good Management Practices relating to water quality’ - dated September 2015.</u></p>

### Gravel bed

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
102.9	Burwood Station Ltd	Gravel bed		Could add gravel bed description.

### Habitat

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.87	WILSON Shannon	Habitat	Support in part	Define “habitat”.
877.82	WILSON Aaron	Habitat	Support in part	Define “habitat”.

## Hazardous substance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
658.3	Ralph Moir & Associates	Hazardous substance		The term hazardous substance should either be defined in the glossary in such a way that it is clear what is meant or the wording should be amended to read "...contains only domestic wastewater."

## High stocking rate

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
5.18	ADAMS A J & P G	Stocking rate		Stocking rates need to be defined.
179.12	CROOKS Jonathan Ross & Sarah Jane	High stocking rate		Define high stocking rate.
553.15	McPhelzo Trust (C G & M P Pullar)	High stocking rate	Oppose	Define 'intensive/high stocking rate', by number x category of animal x land type and that this definition/calculation be developed by experts outside of ES.
554.17	McPhelzo Trust (Z, E & P Pullar)	High stocking rate	Oppose	Define 'intensive/high stocking rate', by number x category of animal x land type and that this definition/calculation be developed by experts outside of ES.
556.14	MCRAE Joe	High stocking rate		Define high stocking rate.
557.14	MCRAE Matt	High stocking rate		Provide definition for high stocking rate.
774.10	STEWART Vanessa	High stocking rate	Amend	An intensive high stocking rate should be defined (example – winter grazing of swedes and kale with sheep.)
787.9	SUTHERLAND Richard	High stocking rate		Define high stocking rate or what is considered intensive.

## Independently audited self-managed participants

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
47.41	Balfour, Wendonside & Waikaia Group	Independently Audited Self-Managed participants		Provide a definition of 'Independently Audited Self-Managed participants'.
189.57	Dairy Holdings Ltd	Register of Independently Audited Self-Management Participants		Include a definition of "Register of Independently Audited Self-Management Participants": <u>Means the register of those landholders who choose to manage their property in accordance with independently audited self-management principles set out in [refer to guidance document]. The register can be found on the Environment Southland website.</u>
259.22	F D Enterprises Ltd	Independently Audited Self-Managed Participants	Oppose in part	Provide a definition in the plan of "Independently Audited Self-Managed participants"
464.44	Landpro Ltd	Independently audited self-managed participants	Oppose in part	we seek that ES provide a definition in the plan of "Independently Audited Self-Managed participants".
661.52	Ravensdown Ltd	Independently Audited Self-Managed Participants	Oppose in part	Ravensdown seeks for definition of 'Independently Audited Self-Management' be included in the Plan.
766.17	STEVENS Brendon	Independently Audited Self-Managed Participants	Amend	Provide a definition for Independently Auditing Self-Managed Participants.
759.41	Springlands Group Ltd	Independently Audited Self-Managed Participants		Provide a definition in the plan of "Independently Audited Self-Managed participants".

## Individual application

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
24.117	Aratiatia Livestock Ltd	Individual application	Oppose	Specifically define “individual application”.

## Lake/river/pond and margins

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
723a.5	SHEARING Euan & Lisa	Lake and River	Amend	New definition – more clarification for lake and river.
14.8	ALLAN Frazer & Karen	Lake	Amend	Definition of lake and how that impacts on stock dam/duck ponds and sediment ponds under restriction to cultivate within 100m of a lake.
14.9	ALLAN Frazer & Karen	Lake	Amend	Definition of lake and how that impacts on stock dam/duck ponds and sediment ponds under exclusion of stock.
25.43	Ardel Dairies Ltd	Lake/ waterbody	Oppose	New definition of Lake (does it include ‘pond’ or waterbody.
26.20	Ardoyne Farm Dairys	Lake		New definition of Lake.
27.9	Arkley Farm Ltd	Lake		That a lake be a significant body of water e.g. 200ha+.
34.5	BAIRD A J & L S	Lake		Define a lake.
36.3	BAIRD Allan	Lake	Amend	Define Lakes or coastal marine areas to lakes and wetlands that have been named.
37.6	BAIRD J J	Lake		Define lakes or coastal marine areas to lakes and wetlands that have been named.
38.7	BAIRD M G & R J	Lake		Define lakes or coastal marine areas to lakes and wetlands that have been named.
45.2	BALDWIN Geoffrey	Lake	Amend	Clarification needs to be made on what is classified as a Lake.
47.42	Balfour, Wendonside & Waikaia Group	Lake	Amend	We seek clarity of the definition of a lake to be included within the PSWLP. Include the following definition to the PSWLP: Lake: “A natural body of fresh water which is entirely surrounded by land.”
51.3	Barkman Farming Ltd	Lake		Clearly define lake.
54.23	Bayswater Dairy Ltd	Lake	Oppose	Lake needs to be defined so that it doesn’t include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.45	BRENTLEIGH Family Trust	Lake		Define Lake.
93.13	Broadacres Ltd	Lake		Include definition of “lake”.
118.15	Carmyllie Farm	Lake		Definition of lake is currently based on RMA which includes most duck ponds etc. so that needs to be tightened.
153.7	Coalbrook Partnership	Lake		Define a lake.
160.11	COLLING Megan	Lake/pond		Include definition of a lake/pond.
163.7	CONLAN Eddie & Judy Family Trust	Lake		That the term “lake” be defined as water bodies over a certain size e.g. 1 ha surface area and has water flowing in and out of it.
164.6	Conlan Farming	Lake	Amend	Need to define a lake. Needs to be larger than a duck pond and clarify whether we need to be 100m away if below it.
168.6	COPLAND R D & N J Family Trust	Lake	Amend	A “lake” needs defining by size, duck ponds, effluent ponds, ponding in paddocks need to be excluded from this rule. I would propose a lake be defined as being greater in surface area than 1ha with natural waterways into and out of it.
179.13	CROOKS Jonathan Ross & Sarah Jane	River		Definition of a River that we suggest be included in the Plan: River means a continually flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal).
179.14	CROOKS Jonathan Ross & Sarah Jane	Lake		There is no definition of a Lake in the Plan. A definition needs to be included to clarify whether farm ponds are included within this rule.
188.6	Dairy Farms NZ Ltd	Lake	Amend	New definition for “lakes”.
198.10	DIACK Hugh	River	Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more’.
202.6	DICKSON Brent Gordon	Lake	Amend	What constitutes a lake should be specifically spelt out.
203.6	DICKSON Bruce John	Lake	Amend	What constitutes a lake should be specifically spelt out.
205.39	Dillon Ag Ltd (Chris Dillon)	Lake		Define in Plan.
206.39	Dillon Ag Ltd	Lake		Define in Plan.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Rochelle Dillon)			
208.11	DILLON M J & S E	Lake		Define a lake but exclude duck pond from this as needing to have 100m distance around it.
209.51	DIPROSE Dave	Lake/river		Need good definitions around dry land habitats, rivers, wetland, lakes.
214.20	Donald Farm	Lake		The word Lake needs defined. <u>Recommend</u> a natural continuous area of permanent water holding greater than 1 square kilometre.
222.7	DUFF Bradon	Lake	Amend	A lake be termed as above 2 hectares.
234.5	EADE Bruce	Lake	Amend	Lake definition – “not a duck pond.”
245.8	Enfield Ltd	Lake		Provide definition of ‘lake’.
258.36	Eyre Creek Ltd	Lake	Oppose	A lake should be a known named lake i.e. Lake Te Anau. A duck pond should not be defined as a lake and a practical setback i.e. 3m should be applied as far as cultivation is concerned.
260.4	Fairlight Station Ltd	Lake		Define ‘lake’ to exclude duck ponds.
281.6	Four Legged Farming Ltd	Lake	Amend	That the term “lake” be defined as water bodies over a certain size e.g. 1ha surface area.
294.8	Gardyne Agriculture Ltd (Duncan Gardyne)	Lake	Oppose Amend	Lake area needs to be defined. Lake = 100 hectares or more.
295.8	Gardyne Agriculture Ltd (Fred Gardyne)	Lake	Oppose	Area of lake needs to be defined. Lake = 100 hectares or greater. Allow a three metre rule if land gradient is less than 8 degrees leading up to water edge.
299.26	GARDYNE John	Lake		Lakes need named and defined.
300.20	GARDYNE Jonathan	Lake	Oppose	What is a Lake defined as?
303.4	Garfield Farm Ltd	Lake/pond	Oppose	A decision should be made on what a pond or lake is classed as, or temporary water from excess rain, flooding etc.
322.11	Glenlapa Station	Lake		Need to define “Lake”.
323.7	Glenshe Trust	Lake		Exclude duck ponds from being included as a lake.
339.25	GUNN Olivia	Lake		Lake needs to be defined so that it doesn’t include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
344.10	Hall Ag Ltd (Glenda Hall)	Lake	Oppose Amend	Define ‘Lake’.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
345.10	Hall Ag Ltd (John Hall)	Lake	Oppose Amend	Define 'Lake.'
361.22	HBG AgriLimited	Lake		Clarify the definition of a lake so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
365.18	HEENAN M D and D W	Pond	Amend	Include definition of pond within the glossary.
367.3	HEISS Raphael	Lake	Oppose	Define 'Lake' to exclude a duckpond.
386.27	Hopcroft Farms Ltd	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
405.4	Huntly Farm Partnership	Lake		Include definition of a lake.
434.8	Kauana Dairy Ltd & Taffy Ltd	Lake	Oppose	Clarify definition of 'lake'.
450.7	Kmore Farming Ltd	Lake	Amend	Define lake.
465.5	Lankirk Trust	Lake		Provide a clear definition of what lakes are to be protected.
482.30	Lower Aparima Catchment Group	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
532.6	MCKEE M & C Family Partnership	Lake	Amend	Name Lakes i.e. Marora, Manapouri, Te Anau etc.
541.3	MCLEAN Campbell	Lake	Oppose	What is considered to be a lake? Should be a size of waterbody or a named lake i.e. Lake Te Anau.
545.9	MCLEOD Emma	Lake	Amend	Provide a definition with reference to the parameters that deem a body of water to be a lake.
552.7	MCPHAIL Neil	Lake		There needs to be clarification of a lake, I would suggest using Appendix Q to clarify what a lake is.
564.22	Mid-Aparima Catchment Group	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
567.5	MILLER Geoffrey	Lake	Amend	Define the word 'lake' e.g. Te Anau, Lake Wakatipu etc.
569.23	MILLER R J Trust	Lake	Oppose	We seek the definition of a lake to be include within the pSWLP.
569.24	MILLER R J Trust	Lake	Oppose	We seek the definition of a lake to be include within the pSWLP and that a three metre buffer applies to intensive winter grazing adjacent to duck ponds.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
587.5	MOUAT James	Lake		Include a definition of 'lake' that does not include man made ponds.
606.5	Norham Farm Ltd	Lake	Oppose	Reference to the bed of a lake needs to clearly exempt man made duck ponds on farms from this.
613.7	NZ Groundspread Fertilisers Association Inc.	Lake		Include definition of Lake.
625.5	Parawa Ltd	Lake	Oppose	Lakes need to be defined and current fenced off duck ponds with riparian strips remains status quo.
627.9	PATERSON Ross	Lake	Amend	Define lake, it should mean an actual lake. Duck ponds and man-made wetland ponds should be outside the definition of lake.
628.11	PATERSON Stephanie	Lake	Amend	Define Lake as a Lake.
638.11	Pinnacle Farming Company Ltd	Lake		A clear definition of a 'lake' versus a pond.
659.8	Rathfriland Ltd	Lake	Amend	Define the size of water body – a 'lake' is...
666.34	Rimu Grasslands Ltd & Leicester Downs Ltd	Lake		Include the definition for lake.
678.11	ROBINSON Jeffrey	River	Oppose	Amend the rule to include the following definition for a river, artificial watercourse and modified watercourse: "a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more".
679.11	ROBINSON Michael	River		Include the following definition for a river, artificial watercourse and modified watercourse: "a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more".
681.31	Rockytommy Farming Ltd	Lake		Include the following definition to the PSWLP: Lake: "A body of fresh water which is entirely or nearly surrounded by land."
682.24	Rokenwai Farming Ltd	Lake	Amend	Include the following definition to the PSWLP: Lake: "A body of fresh water which is entirely or nearly surrounded by land." (excluding duck ponds).
687.4	Roseneath Dairies	Lake		Include definition of "lake".
721.7	SHEARING Dean	Lake	Amend	More clarification on what a lake, river.



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
723.5	SHEARING Raymond	Lake and River	Amend	New definition – more clarification for lake and river.
737.35	Smithill Ltd	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
739.5	SOMERVILLE John	Lake	Amend	Needs clarification of what denotes a lake i.e. size or named.
752.326	Southland Fish & Game Council	Lake		Insert the following definitions set out in the RMA: <u>“Lake means a body of fresh water which is entirely or nearly surrounded by land”</u>
752.327	Southland Fish & Game Council	River		Include a definition of: <u>“River means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal)”</u>
752.328	Southland Fish & Game Council	Lake and river margins	Support in part	Insert the following definition: <u>“Lake and river margins includes areas beyond the wave action of a lake or extending away from the banks of a river depending on topography and other factors.”</u>
752.329	Southland Fish & Game Council	Lake and river margins	Support in part	Lake and river margins - Includes areas beyond the wave action of a lake or extending away from the banks of a river depending on topography and other factors.”
759.42	Springlands Group Ltd	Lake		We seek clarity of the definition of a lake to be included within the PSWLP and that it clarifies that a 3 metre buffer applies to intensive winter grazing adjacent to duck ponds. Include the following definition: Lake: “A body of fresh water which is entirely or nearly surrounded by land.”
761.23	STALKER Hanna & Callum	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
766.18	STEVENS Brendon	Lake	Amend	The definition of “lake” needs clarified
775.13	Stoney Creek Station Ltd	Lake		Provide some definition for ‘Lakes’.
782.7	STRINGER Gay	Lake	Oppose	Definition of the word lake to be as per Lake Te Anau or Lake Wakatipu – it should not include the duck pond.
783.8	STRINGER Joe	Lake	Neutral	Define a lake as a body of water having a name. Duck ponds should be excluded from this.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
787.10	SUTHERLAND Richard	Lake		What is the definition of a lake?
792.38	TAYLER Matthew	Lake		Need a definition of a lake – say any named lake over 5 square km.
793.12	TAYLER Phillip	Lake	Amend	Provide a definition for lakes. ES to identify all lakes and waterways to be fenced and maps provided to landowners. A process should be defined allowing landowners to challenge ES maps if they feel waterways identified do not meet definition.
798.21	TEMPLETON Luke	Lake		Provide a definition for lake.
799.24	TEMPLETON Peter	Lake		Provide a definition for lake.
802.41	The 254 Partnership & Gerken Family Trust	Lake		There is no definition of these in the plan. At the meetings this has been discussed and it was said by ES employees that duck ponds would come under Lakes. This seems ridiculous given they were created for recreational purposes, as sediment traps or for habitat.
804.5	TIPPETT Christie	River	Oppose Amend	Amend the rule so to include the following definition for a river, artificial watercourse and modified watercourse: “a permanently flowing surface waterbody which has a width of 1m or more and a depth of 30cm or more”.
807.12	The Terraces Ltd	Lake	Oppose	Provide definitions for ‘waterbodies’ & ‘lakes’.
818.27	Tomogalak Gorge Trust (John Keen)	River	Amend	Define a river that triggers total grazing exclusion.
819.25	Tomogalak Gorge Trust (Linzi Keen)	River		Define a “river” that triggers total grazing exclusion.
822.10	Tremaine Farming Partnership	Lake	Neutral	That a definition of lake is given in the document as there presently isn't one. A lake should be defined as a freshwater body of water over a certain size.
824.13	Tulloch Farm Glendhu Ltd	Lake		Include definition of ‘Lake’
825.14	Tulloch McNab Transport Ltd	Lake	Oppose	No specific decision requested.
828.12	Twin Farm Ltd	Lake	Oppose	Define lake and remove duck pond from this as being needed to have 100m distance around it in (b)(viii)
840.12	W & B Clarke & Son Ltd	River		No definition of a River in the Plan. This should be included to clarify requirements around

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				small natural watercourses.
840.13	W & B Clarke & Son Ltd	Lake		There needs to be a clear definition of what constitutes a lake and this needs to exclude farm ponds/ duck ponds etc.
851.6	WEIR Darren	Lake	Oppose	New definition – need to define what lake is and reduce distance.
853.6	WEIR Victoria	Lake	Oppose	New definition of lake - clarify whether or not a pond is a lake.
861.39	WHITE John Copeland	Lake		Lake needs to be defined so that it doesn't include bodies of water that were designed to act as sediment traps or man-made water bodies solely for recreational purposes.
864.11	Whyte Partnership	Lake		Include a definition of the term “lake” and exclude duck ponds.
865.13	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Lake		A definition of a lake and how that impacts on stock dam/duck ponds and sediment ponds under exclusion of stock. A definition of a lake and how that impacts on stock dam/duck ponds and sediment ponds under restriction to cultivate within 100m of a lake.
868.42	Wilkins Farming Ltd	Lake	Oppose	A lake should be a known named lake i.e. Lake Te Anau. A duck pond should not be defined as a lake and a practical setback i.e. 3m should be applied as far as cultivation is concerned.
881.5	Windyridge (Fleming) Ltd Farm	Lake	Amend	Define lake and clarify whether it includes a duck pond or has a size limit.

### Life supporting capacity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.330	Southland Fish & Game Council	Life supporting capacity		Insert the definition of <i>“life supporting capacity”</i> set out in the pRPS.

### Industrial/trade premises

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.33	Real Journeys Ltd	Industrial/trade premises		Include a definition for industrial or trade premises.

## Intensive

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
107.8	BYARS Richard	Intensive		Define intensive.
117.3	Campbells Block Ltd	Intensive stocking rate		Define high or intensive stocking rate.
179.15	CROOKS Jonathan Ross & Sarah Jane	Intensive		Define intensive.
277.67	Fonterra Co-operative Group Ltd	Intensive farming	Oppose in part	Provide a definition of “high intensity farming”.
322.12	Glenlapa Station	Intensive		Define “intensive”.
555.18	MCRAE Daryl & Ruth	Intensive stocking rates	Oppose	New definition – define “intensive stocking rates”, noting differences between farmers who only winter their own capital stock and those who increase their winter stocking rates intensively grazing additional stock.
627.10	PATERSON Ross	Intensive	Amend	Please clarify this.
656.9	RABBIDGE Stephen	Intensive		Define intensive grazing of sheep.
752.331	Southland Fish & Game Council	Intensive horticulture	Support Amend	Include a definition of “intensive horticulture” in the Glossary of the pWLP, which includes intensive horticulture activities such as cultivation and commercial growth of root vegetable crops and bulbs, such as tulips.
771.18	STEWART Family Trust (Trevor Stewart)	Intensive	Amend	An intensive high stocking rate should be defined (example – winter grazing of swedes and kale with sheep).

## Managed stock exclusion

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
14.10	ALLAN Frazer & Karen	Managed stock exclusion	Amend	A clear definition/meaning of “managed stock exclusion”.
865.14	WHYTE S G, Linhope Trust, Berry Farm Trust & BERRY Ltd	Managed stock exclusion		A clear definition/meaning of ‘Managed stock exclusion’.

## Management plan

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
390.52	Horticulture NZ	Management plan		Include a definition for Management Plan as follows: <u>A Management Plan describing on-farm management and best management practices that is prepared in accordance with Appendix N.</u>

## Margin

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.128	Forest & Bird NZ	Margin		<u>Insert definition of Margin as follows:</u> <u>Land immediately adjacent to the bed of a river, wetland, lake or estuary which is likely to be affected by a high water table, flooding, fluvial erosion, or sediment deposition, and often contains distinctive vegetation. The size of the margin will vary according to local site factors but may extend to the limits demarcated by natural river terraces and constructed stop banks.</u>

## Material change

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
47.43	Balfour, Wendonside & Waikaia Group	Material change	Support in part	We seek that the definition of “Material Change” is in relation to a significant or fundamental change.
62.24	Beef + Lamb NZ	Material change		Add a definition of ‘material change in land use’. Consult industry to establish what should be included in this definition, so the result is industry agreed.
208.12	DILLON M J & S E	Material change	Amend	Define “Material Change” as a significant or fundamental change.
259.23	F D Enterprises Ltd	Material change	Support in part	I seek that the definition of “Material Change” is in relation to a significant or fundamental change.
464.45	Landpro Ltd	Material change	Support in part	We seek clarification around the definition of ‘material change’ is included in the PSWLP.
759.43	Springlands Group Ltd	Material change	Support in part	We seek that the definition of “Material Change” is in relation to a significant or fundamental change.

## Mechanical cultivation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
40.18	BAKER David	Mechanical cultivation		Definition of mechanical cultivation making sure it includes direct drilling and spray and prey.
179.16	CROOKS Jonathan Ross & Sarah Jane	Mechanical cultivation		There is no definition in the draft plan of what mechanical cultivation is. A definition needs to be added to the plan to clarify whether low impact methods such as direct drilling is considered to be mechanical cultivation.
480.10	Lowburn Ag Ltd (Jonathan Pemberton)	Mechanical cultivation		Confirm direct drilling does not fall under this category. This should be considered sowing not cultivation as very little disturbance occurs to the soils surface/sub surfaces in this process.
524.6	MCINTYRE Craig & Rebecca	Mechanical cultivation		Provide a definition on what is considered “mechanical cultivation”.
524.7	MCINTYRE Craig & Rebecca	Mechanical cultivation		I do not believe that direct drilling grass to grass from November to February on land with a 20 – 30 degree slope would have a negative impact on water quality. I propose that this requirement is not included in the plan.
528.5	MCKAY A S & D E	Mechanical cultivation		Define “mechanical cultivation”.
638.12	Pinnacle Farming Company Ltd	Mechanical cultivation		A clear definition of ‘Mechanical cultivation’.
775.14	Stoney Creek Station Ltd	Mechanical cultivation		Provide some definition for ‘Mechanical cultivation’.
840.14	W & B Clarke & Son Ltd	Mechanical cultivation		Definition in the draft plan of what “mechanical cultivation” is.

## Minimum tillage

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
861.40	WHITE John Copeland	Minimum tillage		Provide definition for minimum tillage.
386.28	Hopcroft Farms Ltd	Minimum Tillage	Amend	Provide definition for minimum tillage.
638.13	Pinnacle Farming Company	Minimal tillage		A clear definition of ‘Minimal tillage’.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Ltd			

### Mitigations

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.83	WILSON Aaron	Mitigations		The term “mitigations” as written in this plan needs to be defined.

### Nationally and regionally significant infrastructure

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.34	Real Journeys Ltd	Nationally and regionally significant infrastructure		Define nationally and regionally significant infrastructure.

### Natural character

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.332	Southland Fish & Game Council	Natural character	Support in part	<p>Include the following definitions in the Glossary:</p> <p><b>‘Natural character may include such attributes and characteristics as:</b></p> <ol style="list-style-type: none"> <li><u>Natural elements, processes and patterns;</u></li> <li><u>Biophysical, ecological, geological, geomorphological and morphological aspects; and</u></li> <li><u>The natural movement of water and sediment during hydrological and fluvial processes.</u></li> </ol>

## Natural character of rivers, lakes and wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.333	Southland Fish & Game Council	Natural character of rivers, lakes and wetlands		<p>Include a new definition for 'natural character' as follows:</p> <p><u>“The <b>Natural Character of rivers lakes and wetlands</b> may include such attributes and characteristics as:</u></p> <p><u>a) natural elements, processes and patterns, chemical, biophysical, ecological, geological, geomorphological and morphological aspects,</u></p> <p><u>b) natural landforms;</u></p> <p><u>c) the natural movement of water and sediment including hydrological and fluvial processes;</u></p> <p><u>d) places that are wild and scenic; and</u></p> <p><u>e) a range of natural character from pristine to modified.”</u></p>

## Natural watercourse

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
733.19	SMITH Hamish & Karen	Natural watercourse		Clarify the definition of 'natural' watercourse and include specific criteria.

## Non consumptive use

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
277.68	Fonterra Co-operative Group Ltd	Non-consumptive use		<p>Include the following definition of “Non-consumptive use” -</p> <p><u>Any take of fresh water where the associated use and/or discharge of that water substantially returns water to the same water body at or about the same location; and does not adversely affect the spatial or temporal availability, or the physical, chemical or biological quality for users of the water resource into which the water is discharged.”</u></p>



## Nutrient budget

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
661.53	Ravensdown Ltd	Nutrient budget	Neutral	<p>Ravensdown seeks a definition of Nutrient Budget be added to the Plan as follows:</p> <p><u>“A Nutrient Budget means:</u>  <u>A statement of the total nutrient balance for a particular farm property or farming enterprise, taking into account all the nutrient inputs and all the outputs. For use in the Appendix N ‘Farm Management Plan’ a nutrient budget must be prepared:</u></p> <p>(i) <u>in accordance with the most recent version of the “Overseer Best Practice Data Input Standards”;</u> and</p> <p>(ii) <u>by a person who is a Certified Nutrient Management Advisor.</u></p>
803.61	The Fertiliser Association of NZ	Nutrient budget	Amend	<p>Include a definition of ‘Nutrient Budget’ as follows:</p> <p><b><u>A Nutrient Budget means:</u></b>  <u>A statement of the total nutrient balance for a particular farm property or farming enterprise, taking into account all the nutrient inputs and all the outputs. For use in the Appendix N ‘Farm Management Plan’ a nutrient budget must be prepared:</u></p> <p>(i) <u>in accordance with the most recent version of the “Overseer Best Practice Data Input Standards”;</u> and</p> <p>(ii) <u>by a person who is a Certified Nutrient Management Advisor.</u></p>

## Nutrient user group

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
189.58	Dairy Holdings Ltd	Nutrient user group		<p>Include a definition of “nutrient user group”:</p> <p><u>Means a group of properties in single or multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management.</u></p>

## Ngai Tahu indicators of health

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
797.64	Te Runanga o Ngai Tahu	Ngai Tahu indicators of health		<p>Add a new definition that reads:</p> <p><u>Ngāi Tahu Indicators of Health</u></p> <p><u>The Ngāi Tahu Indicators of Health is a tool being developed by Papatipu Rūnanga to facilitate monitoring and provide long term data that can be used to assess land, water and taonga species health over time. The long term aspirations of the Indicators are linked to mahinga kai and the realisation of the Ngāi Tahu Treaty Settlement.</u></p> <p><u>The indicators could include, but are not limited to, those provided on page 150 of Te Tangi Te Tangi a Turia Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008.</u></p>

## Non-consumptive use

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
277.69	Fonterra Co-operative Group Ltd	Non-consumptive use	Support in part	<p>Include the following definition of “Non-consumptive use” -</p> <p><u>Any take of fresh water where the associated use and/or discharge of that water substantially returns water to the same water body at or about the same location; and does not adversely affect the spatial or temporal availability, or the physical, chemical or biological quality for users of the water resource into which the water is discharged.”</u></p>

## Over allocation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
464.46	Landpro Ltd	Over allocation	Oppose in part	Provide a definition of ‘over allocation’ or removal of the term all together.

## Overseer

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
89.46	BRENTLEIGH Family Trust	Overseer		Include a definition of Overseer.
205.40	Dillon Ag Ltd (Chris Dillon)	Overseer		Include in glossary as new definition.
206.40	Dillon Ag Ltd (Rochelle Dillon)	Overseer		Include in glossary as new definition.
802.42	The 254 Partnership & Gerken Family Trust	Overseer		There is no mention of this in the glossary? The people who designed this software did so for Fertiliser Sales Reps and it was never designed as a regulatory tool. Where is the peer review and science to prove this software is relevant and accurate for the use in which ES are intending to use it?

## Point source discharge

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.84	WILSON Aaron	Point Source Discharge		Clarification as to “point source discharge” that is not rural-related as this has been covered in the plan already.

## Regionally significant wetlands

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.334	Southland Fish & Game Council	Regionally significant wetlands		Insert the following definition: <u>“Regionally significant wetlands means wetlands identified in Appendix A (Regionally Significant Wetlands in Southland) and any natural wetland with indigenous vegetation cover.”</u>

### Renewable electricity generation activities

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.35	Real Journeys Ltd	Renewable electricity generation activities		Define renewable electricity generation activities.

### Riparian planting

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
387.25	HORRELL Andrew Russell	Riparian planting	Amend	Provide definition of riparian planting.
861.41	WHITE John Copeland	Riparian planting		Define riparian planting.

### Significant

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
108.114	BYTHELL Jesse	Significant	Support	I seek clarification on the definition of 'significant' regarding clause (a)(ii).
583.30	MOSEBY Ryan	Significant	Amend	Need clarification/definition on what significant is.

### Significant indigenous biodiversity

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
749.79	Southland Conservation Board	Significant indigenous biodiversity		A definition of what is meant by 'significant' in the context of 'significant indigenous biodiversity'. Include in the definitions a definition for <i>significant indigenous biodiversity</i> .

### Significant indigenous vegetation

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
877.85	WILSON Aaron	Significant indigenous vegetation	Support in part	Define “significant indigenous vegetation”.
880.88	WILSON Shannon	Significant indigenous vegetation		Define “Significant indigenous vegetation.”

### Solid

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
663.11	RDAgritech Ltd	Solid	Amend	Amend the definitions, to include a definition for “solid” in relation to effluent, or amend the definition of sludge to make it clearer.

### Sports fish and game management plan

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.335	Southland Fish & Game Council	Sports fish and game management plan		Insert the following definition: <u>“<b>Sports fish and game management plan</b> means a sports fish and game management plan approved under section 17M of the Conservation Act 1987.”</u>

### Stock truck effluent disposal site (STEDS)

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
614.41	NZ Transport Agency	Stock truck effluent disposal site		Stock truck effluent disposal site (STEDS). – A stock truck effluent storage and disposal facility.

## Strategic facilities

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
611.13	NZ Defence Force	Strategic facilities	Amend	Insert a definition of 'strategic facilities'.

## Structures

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
664.36	Real Journeys Ltd	Structure		Include a definition for "structures".
877.86	WILSON Aaron	Structure	Oppose in part	Rule 35(b)(iii) needs to define the term "structure".
880.89	WILSON Shannon	Structure	Oppose in part	Rule 35(b)(iii) needs to define the term "structure".

## Tangata whenua

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
880.90	WILSON Shannon	Tangata whenua	Support in part	Amend definition of "tangata whenua" to include all residents and peoples of Southland, not just in reference to iwi.

## Temporary military training facility

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
611.14	NZ Defence Force	Temporary military training facility	Amend	The following definition of 'temporary military training activities' should be inserted to provide for the requested amendments to policies and rules for these activities: <b><u>"Temporary military training activity means a temporary military activity undertaken for defence purposes. The term 'defence purpose' is described in section 5 of the Defence Act 1990."</u></b>

## Vegetation clearance

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
279.129	Forest & Bird NZ	Vegetation clearance		<p>Insert definition of Vegetation clearance as follows:</p> <p><u>Means the removal, trimming, felling, or modification of any vegetation and includes cutting, crushing, cultivation, soil disturbance including direct drilling, spraying with herbicide or other substance, burning.</u></p> <p><u>Clearance of vegetation includes the deliberate application of water or other substance, where it would change the ecological conditions such that the resident indigenous plant(s) are killed or threatened by competitive exclusion, or disease. Includes dry land cushion field species.</u></p>
752.336	Southland Fish & Game Council	Vegetation clearance		<p>Insert the following definition:</p> <p><b><u>“Vegetation clearance</u></b></p> <p><u>The clearance or destruction of woody vegetation (exotic or indigenous by physical, mechanical, chemical or other means, including: felling vegetation, spraying of vegetation by hand or aerial means, hand clearance and the burning of vegetation.”</u></p>

## Waste

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
265.119	Federated Farmers of NZ (Southland Province)	Waste – animal and vegetable	Oppose in part	Include a definition of animal and vegetable waste in the glossary including a volume measure.

## Water

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
752.337	Southland Fish & Game Council	Water		<p>Include a definition of:</p> <p><b><u>“Water—</u></b></p> <p><u>(a) means water in all its physical forms whether flowing or not and whether over or under the ground;</u></p>

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
				(b) includes fresh water, coastal water, and geothermal water: (c) does not include water in any form while in any pipe, tank, or cistern.”

### Waterbodies/waterways/watercourse

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
11.9	Agribusiness Consultants Ltd	Waterway		Waterway definitions should be improved to remove ephemerals and swales if such a rule was imposed. Further changes to such a rule could be made to include some swales, ephemerals in the future, as awareness and science around the management of these improves.
26.21	Ardoyne Farm Dairys	Waterway		New definition of waterway.
33.11	BACON V M	Waterway	Oppose	What is a waterway? Some areas on my property are steep and there are springs running from the hills, fencing are not practical. Is this a waterway?
33.12	BACON V M	Waterway	Oppose	Clarify what is a water way.
54.24	Bayswater Dairy Ltd	Waterway	Oppose	Include a definition of ‘waterway’. We recommend that Fonterra’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the “outer edge” of the waterway starts and at what flow/level. E.g. “normal flow.”
56.10	BEATTIE Michael & Lynley	Waterway		A water flow normally of 1 metre wide 30cm deep with a gravel bed runs 6 months of the year.
89.47	BRENTLEIGH Family Trust	Waterbody		Define Waterbody.
93.14	Broadacres Ltd	Waterbodies		Include definition of “waterbodies”.
102.10	Burwood Station Ltd	Waterway	Oppose	Insert a definition of ‘waterway’. I think the adoption of Fonterra’s definition would be sensible. One metre wide 30cm deep runs six months of the year.
118.16	Carmyllie Farm	Waterway		Definition of waterways needs to be clearer.
150.8	CLIFFORD Mervyn & Judy-Ann	Waterway	Support Oppose	Clear definition of all waterways including lakes.
153.8	Coalbrook Partnership	Waterway	Amend	Define a natural waterway.
205.41	Dillon Ag Ltd	Waterbody		Define in Plan



Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	(Chris Dillon)			
206.41	Dillon Ag Ltd (Rochelle Dillon)	Waterbody		Define in Plan.
234.6	EADE Bruce	Waterway	Amend	Waterway definition – “40mm deep x 150mm wide that flows more than 50% of the year.”
251.5	Euan Crump Farming Co Ltd	Waterbody	Amend	Recommend Dairy NZs definition of waterbody.
293.5	GAMBLE S W & J M	Watercourse		Include amount of regular flow/flood flow to help determine any exclusion requirements.
299.27	GARDYNE John	Waterway	Neutral	Need a definition of “waterways” in plan.
323.8	Glenshe Trust	Waterway		Define the definition of a waterway.
338.3	GUNN Graeme	Watercourse	Support Amend	Watercourse must be defined as permanently flowing before they are required to be fence.
339.26	GUNN Olivia	Waterway		We recommend that waterway be defined in the glossary in the plan. We recommend that Fonterra’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the “outer edge” of the waterway starts and at what flow/level. E.g. “normal flow.”
361.23	HBG AgriLimited	Waterway	Oppose	Amend to used Fonterra’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) with the addition of a gravel bed.
361.24	HBG AgriLimited	Waterway		Include a definition of ‘waterway’. Fonterra’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the “outer edge” of the waterway starts and at what flow/level the rule applies. E.g. “normal flow” versus “in flood.”
376.2	Hippos Family Trust	Waterway	Oppose	Provide definition of a waterway.
386.29	Hopcroft Farms Ltd	Waterway	Oppose	I recommend that Dairy Accord’s definition of a waterway (1 metre wide, 30cm deep, runs 6 months of the year) is used with the addition of a gravel bed.
386.30	Hopcroft Farms Ltd	Waterway		I recommend that ‘waterway’ be defined in the glossary in the plan. Clarify if this included ephemeral waterways and swales? We recommend that the Dairy Accord’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the “outer edge” of the waterway starts and at what flow/level. E.g. “normal flow”.
389.12	HORRELL P J & J M	Waterway		Define waterway, consider clean streams accord definition.

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425.10	Jedburgh Station Ltd	Waterbody		Define waterbody.
429.9	JOYCE Nathan J & Julie L	Waterbody		Clarification of the definition of Waterbody needed.
444.10	KING Henry	Waterway		Include definition of waterways that addresses <ul style="list-style-type: none"> <li>• Waterways – how wide?</li> <li>• Watercourses?</li> <li>• Swales?</li> <li>• Do they run all year or dry up in the summer? Drought.</li> </ul>
450.8	Kmore Farming Ltd	Waterbodies	Amend	Define waterbodies.
482.31	Lower Aparima Catchment Group	Waterway	Oppose	We recommend that waterway be defined in the glossary in the plan. Clarify if this includes ephemeral waterways and swales? We recommend that the Dairy Accord's definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the "outer edge" of the waterway starts and at what flow/level e.g. "normal flow."
516.5	MCDONALD Cameron	Waterway		Define waterways.
531.4	McKee Highview Ltd	Waterbodies	Amend	Clearly define 'water bodies'.
533.5	MCKEE Rebecca	Waterbodies	Amend	Provide a definition for "waterbodies".
553.16	McPhelzo Trust (C G & M P Pullar)	Waterbodies / waterway	Support in part	Define 'waterbodies' or waterways.
554.18	McPhelzo Trust (Z, E & P Pullar)	Waterbodies / waterway	Support in part	Define 'waterbodies' or waterways.
559.5	MCRAE Neroli	Waterway	Oppose	Define waterways.
564.23	Mid-Aparima Catchment Group	Waterway		We recommend that waterway be defined in the glossary in the plan. We recommend that Fonterra's definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the "other edge" of the waterway starts and at what flow/level. E.g."normal flow."
574.6	MITCHELL G B & M D	Waterway	Amend	Definition of waterway needs clarified.
579.4	MOORE James	Waterbodies	Oppose	Define 'waterbodies' in plan.
599.4	NEWTON T W & L M	Waterway	Oppose	Clarification of what a waterway is.
609.7	NZ Deer Farmers Assoc. –	Waterbodies		Clarify for Policy 18: the definition of "waterbodies"

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
	Southland Branch (Richard Cook)			
619.6	Opio Milk Ltd	Waterway	Clarify	We think the adoption of this definition would be sensible. 1 metre wide 30cm deep runs 6 months of the year..
663.12	RD Agritech Ltd	Waterway/ watercourse	Amend	Amend the definitions, to include a clear and easily interpreted definition for “water ways” (or watercourse).
666.35	Rimu Grasslands Ltd & Leicester Downs Ltd	Waterway		Include the definition for ephemeral waterway.
667.14	Riverfield Farms Ltd	Waterway	Oppose	Recommend to adopt the Fonterra definition of being 1 metre wide, 30cm deep that runs for 6 months of the year with a gravel base. A grass bottom excluded.
668.10	Rivervale Dairies Ltd	Waterway	Clarify	Adopt Fonterra’s definition of waterway being 1 metre wide, 30cm deep, runs 6 months of the year. Could add gravel bed to description.
721.8	SHEARING Dean	Watercourse	Amend	More clarification on what a watercourse is.
723.6	SHEARING Raymond	Watercourse	Amend	New definition – more clarification for water course.
723a.6	SHEARING Euan & Lisa	Watercourse	Amend	New definition – more clarification for water course.
737.36	Smithill Ltd	Waterway		We recommend that 'waterway' be defined in the glossary in the plan. Clarify if this includes ephemeral waterways? We recommend that the Dairy Accord’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the “outer edge” of the waterway starts and at what flow/level. E.g. “normal flow.”
752.338	Southland Fish & Game Council	Waterbodies	Oppose	<b>“Water body means fresh water or geothermal water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof that is not located within the coastal marine area.”</b>
761.24	STALKER Hanna & Callum	Waterway	Oppose	‘Waterway’ be defined in the glossary of the plan and Fonterra’s definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the ‘outer edge’ of the waterway starts and at what flow/level. E.g. ‘normal flow.’
769.6	STEVENSON G V & B P	Waterway		Provide definition of waterway.
775.15	Stoney Creek Station Ltd	Waterbodies		Provide some definition for ‘Waterbodies’.
787.11	SUTHERLAND Richard	Waterway	Oppose	Waterways need a much better definition.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
792.39	TAYLER Matthew	Waterway		Waterways need to be defined in the plan.
793.13	TAYLER Phillip	Waterway	Amend	Provide a definition for waterways. ES to identify all lakes and waterways to be fenced and maps provided to landowners. A process should be defined allowing landowners to challenge ES maps if they feel waterways identified do not meet definition.
799.25	TEMPLETON Peter	Waterway	Oppose	I recommend that Dairy Accord's definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed.
799.26	TEMPLETON Peter	Waterway		Provide a definition for waterways.
802.43	The 254 Partnership & Gerken Family Trust	Waterbodies	No stated	There is no definition of these in the plan. At the meetings this has been discussed and it was said by ES employees that duck ponds would come under Lakes. This seems ridiculous given they were created for recreational purposes, as sediment traps or for habitat.
807.13	The Terraces Ltd	Waterway	Oppose	Provide definitions for 'waterbodies' & 'lakes'.
818.28	Tomogalak Gorge Trust (John Keen)	Waterway	Amend	Define a waterway that triggers total grazing exclusion.
819.26	Tomogalak Gorge Trust (Linzi Keen)	Waterway		Define a "waterway" that triggers total grazing exclusion.
824.14	Tulloch Farm Glendhu Ltd	Waterbodies		Include definition of 'Waterbodies'.
825.15	Tulloch McNab Transport Ltd	Waterbodies	Oppose	No specific decision requested.
827.11	TURNER Paul & Kayleen	Waterway	Oppose	We support Fonterra's definition for "waterway". One metre wide, 30cm deep, runs 6 months of the year. Could add gravel bed to the description.
830.9	Upper Aparima Catchment Group	Waterway	Amend	We think the adoption of Fonterra's definition would be sensible. One metre wide 30cm deep runs six months of the year. Could add gravel bed to description.
833.10	VAN ROOIJEN Marcel	Waterway		No definition of 'waterway' in plan. 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.
841.2	WADWORTH Nicholas	Waterway	Oppose	New definition for 'Waterway' Outline clearly what a water way is? One way of doing this may be all rock bottom rivers need fenced but mud bottom creeks don't need to be.
841.3	WADWORTH Nicholas	Waterway	Oppose	Outline clearly what a water way is? One way of doing this may be all rock bottom rivers need fenced but mud bottom creeks don't need to be.

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
854.7	WELLER Grant & Bernie	Waterway	Support Oppose	Clarify and give concrete examples of what is considered a waterway i.e. Water Accord definition.
861.42	WHITE John Copeland	Waterway	Oppose	We recommend that Dairy Accord's definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed.
861.43	WHITE John Copeland	Waterway	Oppose	We recommend that waterway be defined in the glossary in the plan. Clarify if this includes ephemeral waterways and swales? We recommend that the Dairy Accord's definition of a waterway (1 metre wide, 30cm deep runs 6 months of the year) is used with the addition of a gravel bed. Also there is the need to define where the "outer edge" of the waterway starts and at what flow/level. E.g. "normal flow."
875.10	Willowbank Farms 2015 Ltd & Avondale Dairies	Waterway		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.
891.4	YORKE Bradley	Waterway	Amend	Provide a definition of waterway for absolute clarification e.g. peak flow, minimum flow.

### Wintering pad

Sub ID & Sub Point	Submitter	Provision	Position	Decision sought
25.44	Ardel Dairies Ltd	Wintering pad	Oppose	New definition needed for wintering pad.
47.44	Balfour, Wendonside & Waikaia Group	Wintering pad	Oppose	We seek the ES propose and include definitions of wintering pad in the PSWLP.
208.13	DILLON M J & S E	Wintering pad		Add a definition of wintering pad.
220.27	Drylands Farming Ltd	Wintering pad	Amend	We seek a legal definition.
221.27	DRYSDALE Family Trust	Wintering pad	Amend	We seek a legal definition.
487.14	M K H Farming Ltd	Wintering pad	Amend	Amend by providing definition of wintering pad.
569.25	MILLER R J Trust	Wintering pad		Include new definition of wintering pad.
759.44	Springlands Group Ltd	Wintering pad	Oppose	We seek that ES propose and include a definition of wintering pad.
828.13	Twin Farm Ltd	Wintering pad	Oppose	Add a definition of wintering pad.