

Submission on application APP 20171445
By Woldwide One Limited
To discharge to land and to take and use groundwater

Submitter: Niki Gladding

I am **opposed** to the application and submit that it should be declined in full

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I **would** like the opportunity to speak at the hearing

I am objecting on the basis that the proposed activities – both the take and use of groundwater and the discharge to land – are likely to have effects on the environment that are more than minor.

I want to reiterate the Council's concerns and adopt them as mine own:

- The proposed operation has been modelled using Overseer, and this has shown that the proposal is likely to have greater effects on groundwater quality when compared to modelling of the current operation.
- Council's groundwater monitoring data shows that nitrate concentrations are elevated in this area.
- The application describes some good management practises and mitigation measures undertaken on farm, however these will not fully mitigate the potential adverse effects on water quality.
- Policy 15 of the proposed Southland Water and Land Plan which directs that water quality is to be maintained or improved, nor Policy 16. 1. (b), which strongly discourages applications to further intensify existing dairy farming where the effects on water quality, including cumulatively, cannot be avoided or fully mitigated, or in areas where water quality is already degraded to the point of being over allocated.

I'm also concerned that the proposed storage capacity of the effluent/slurry pond will be inadequate and that the land may not have sufficient capacity to handle the increased effluent volumes and **concentrations** (which I'm concerned have not been considered) if the area experiences prolonged wet or very dry periods. It seems to me that predictable climatic changes may not have been factored into the equations for calculating storage volumes and the capacity of the soil/plants to hold and uptake nutrients.

Therefore, my concern is that the modelled effects on the environment (as stated in the application) are not a good predictor of the actual and potential effects (on soil and ground and surface waters).

I'd also like to challenge the Overseer analysis and the suggestion that the current proposal will see reduced nutrient losses when compared with current practice. Even if this is the case, due to improved

practices, I would argue that the number of cows on the farm should remain at 540 and practices should be improved (as stated) to reduce current losses to ground. Any modelled improvement should NOT be seen as a benefit of the proposed activity.

I'm also concerned that the proposed take of water may have adverse effects on the Bog Burn (that have not been properly considered).

And finally, I'd like to add that the proposed use of groundwater (to enable intensification of dairying) is not an efficient use of the resource particularly given the pressures on water quality and quantity in Southland currently. Therefore, the proposed activities do not meet the purpose of the Act or relevant policies around efficiency within the Regional Plan.

My apologies for the hurried submission. I hope to expand on these point at the Hearing.