

Our reference: 17305
28 November 2017

Environment Southland
Private Bag 90116
Invercargill 9840

Attention: Lauren Maciaszek

Dear Lauren,

RE: Use of Land for Expanded Dairy Farming

Firdale Farms Ltd submitted a resource consent application on 12 October 2017 for renewal of the farm's Discharge Permit and Water Permit. This letter application is to satisfy the additional application required under Section 91 RMA 1991 as stated in the letter from ES dated 25 October 2017. However, it is the applicant's wish that this application be treated together with the AEE submitted in the original application.

The applicant purchased the adjacent property with legal description Part Lot 1 DP 12023 which is 8.54 ha in 2016 and wishes this to be part of their dairy platform.

It is requested that the boundary of the dairy platform be changed to include this property (see Attachment 1). It is not sought for this to be part of the disposal area. Therefore, the effective area and the stocking rate in the application will change to 242 ha and 2.89, respectively.

a) Activity Status

Rule 22(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... Oxidising... physiographic zones is a discretionary activity, provided the following condition is met:

(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

The additional block is part of the assessment and maps of FAFP attached in the submitted application. The proposed activity is, therefore, a **discretionary activity** pursuant to Rule 22(a).



LANDPRO

Make the most of your land

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Gore 9710
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New Plymouth
46 Vivian Street
New Plymouth 4342
+64 6 769 5631

Telarc.
Registered

b) Existing Environment

The physiographic zone of the additional block is oxidising and the soil type is Edendale. The additional land has the same FDE risk, soil type, physiographic zone, GW zone and FMU with the rest of the farm. Please refer to submitted AEE of the original application for detailed discussion.

c) Assessment of Effects

The proposed activity of adding this additional piece of land on the dairy platform results to better stocking rate. Because of the same existing environment, the submitted AEE with its mitigation measures and GMP is applicable and consistent for the proposed activity. However, note that the addition of this land to the dairy platform has the potential to lower nutrient losses because of better (lower) stocking rate.

OVERSEER® was used to model the pre-May 2016 (date of purchase) scenario, with the new block being used for horticulture, and sheep and cattle grazing. If the new block was added to the existing dairy farm but the use of that land was not changed, average nutrient losses from the entire property would be 33 kg N/ha/yr and 0.7 kg P/ha/yr. This is equivalent to 7.6 tonnes of N and 0.17 tonnes of P per year (see Attachment B). These figures represent modelled long-term average losses and are in no way absolute.

OVERSEER® was used to model the proposed scenario, with the new block being used for grazing of pasture. If the new block was incorporated into the existing dairy farm, average nutrient losses from the expanded dairy platform would be 30 kg N/ha/yr and 0.7 kg P/ha/yr. This is equivalent to 7.2 tonnes of N and 0.16 tonnes of P per year (see Attachment B). These figures also represent modelled long-term average losses and are in no way absolute.

The modelling suggests that N and P losses from the expanded dairy farm will be less than those occurring from the current land use activities. Overall, the proposed activity will unlikely to have additional adverse effects considering the assessment, mitigation measures and GMPs presented above and in the AEE submitted with the original application.

d) Statutory Considerations, and Consent Duration, Review and Lapse

Statutory considerations in the submitted AEE are consistent with the proposed activity.

The applicant seeks unlimited duration for the land use consent and a standard 5-year lapse period is sought. Under Section 123 of the RMA, the duration of land use consent is unlimited unless it contravenes with Section 13. The proposed activity on the new block does not contravene with Section 13 and therefore the applicant could seek for unlimited duration.

e) Summary

The applicant has a current resource consent application submitted on 12 October 2017. An additional 8.54-ha block of land has been purchased and the applicant wishes this to be part of the dairy platform, but not as effluent disposal area. The expansion of the dairy farm will result in positive effects on the wider environment in terms of water quality and catchment loading due to the lower overall stocking rate and likely decrease in nutrient losses under this farming scenario.

The applicant would appreciate your consideration of this application, by way of this supplementary letter, alongside the original application submitted on 12 October 2017.

If you have any questions regarding this application, please do not hesitate to contact me at any time.

Yours sincerely,



Zen Gerente

Resource Management Planner

E zen@landpro.co.nz | C 027 528 0683

Attached:

Attachment A – New Farm Boundary

Attachment B – Results of Nutrient Budget

Attachment C – Certificate of Title

ATTACHMENT A – New Farm Boundary



ATTACHMENT B – Results of Nutrient Budget

Kelly Heckler
 AgriBasics Limited
 Central Otago

Client reference:

Farm name: Firdale Farms Previous (Previous to Land Purchase 2016-2015)

Block Nitrogen

Block name	Total N lost (kg N/yr)	N lost to water (kg N/ha/yr)	N in drainage * (ppm)	N surplus (kg N/ha/yr)	Added N ** (kg N/ha/yr)
Non Effluent Waikiwi	2726	31	7.5	206	184
Effluent Waikiwi	4371	33	7.9	262	251
Other farm sources	513				
Whole farm	7610	33			
Less N removed in wetlands	0				
Farm output	7610	33			

* Estimated N concentration in drainage water at the bottom of the root zone. Maximum recommended level for drinking water is 11.3 ppm (note that this is not an environmental water quality standard).

** Sum of fertiliser and external factory effluent inputs.

N/A: N in drainage not calculated for easy and steep pastoral blocks, or for tree and shrubs, riparian, wetland or house blocks.

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Kelly Heckler
 AgriBasics Limitec
 Central Otago

Client reference:

Farm name: Firdale Farms Previous (Previous to Land Purchase 2016-2015)

Block Phosphorus

Block name	Total P lost (kg P/yr)	P lost (kg P/ha/yr)	P loss categories		
			Soil	Fertiliser	Effluent
Non Effluent Waikiwi	18	0.2	Low	Low	Low
Effluent Waikiwi	28	0.2	Low	Low	Low
Other farm sources	125				
Whole farm	171	0.7			

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Kelly Heckler
 AgriBasics Limitec
 Central Otago

Client reference:

Farm name: Firdale Farms Proposed (2016 - 2017)

Block Nitrogen

Block name	Total N lost (kg N/yr)	N lost to water (kg N/ha/yr)	N in drainage * (ppm)	N surplus (kg N/ha/yr)	Added N ** (kg N/ha/yr)
Non Effluent Waikiwi	2545	29	7.0	196	184
Effluent Waikiwi	4192	30	7.2	234	214
Other farm sources	499				
Whole farm	7235	30			
Less N removed in wetlands	0				
Farm output	7235	30			

* Estimated N concentration in drainage water at the bottom of the root zone. Maximum recommended level for drinking water is 11.3 ppm (note that this is not an environmental water quality standard).

** Sum of fertiliser and external factory effluent inputs.

N/A: N in drainage not calculated for easy and steep pastoral blocks, or for tree and shrubs, riparian, wetland or house blocks.

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Kelly Heckler
AgriBasics Limited
Central Otago

Client reference:

Farm name: Firdale Farms Proposed (2016 - 2017)

Block Phosphorus

Block name	Total P lost (kg P/yr)	P lost (kg P/ha/yr)	P loss categories		
			Soil	Fertiliser	Effluent
Non Effluent Waikiwi	16	0.2	Low	n/a	Low
Effluent Waikiwi	27	0.2	Low	n/a	Low
Other farm sources	119				
Whole farm	162	0.7			

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ATTACHMENT C – Certificate of Title



**COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952**




R. W. Muir
Registrar-General
of Land

Search Copy

Identifier SL11A/204
Land Registration District Southland
Date Issued 30 June 1995

Prior References

SL8D/146

Estate Fee Simple
Area 8.5428 hectares more or less
Legal Description Part Lot 1 Deposited Plan 12023

Proprietors

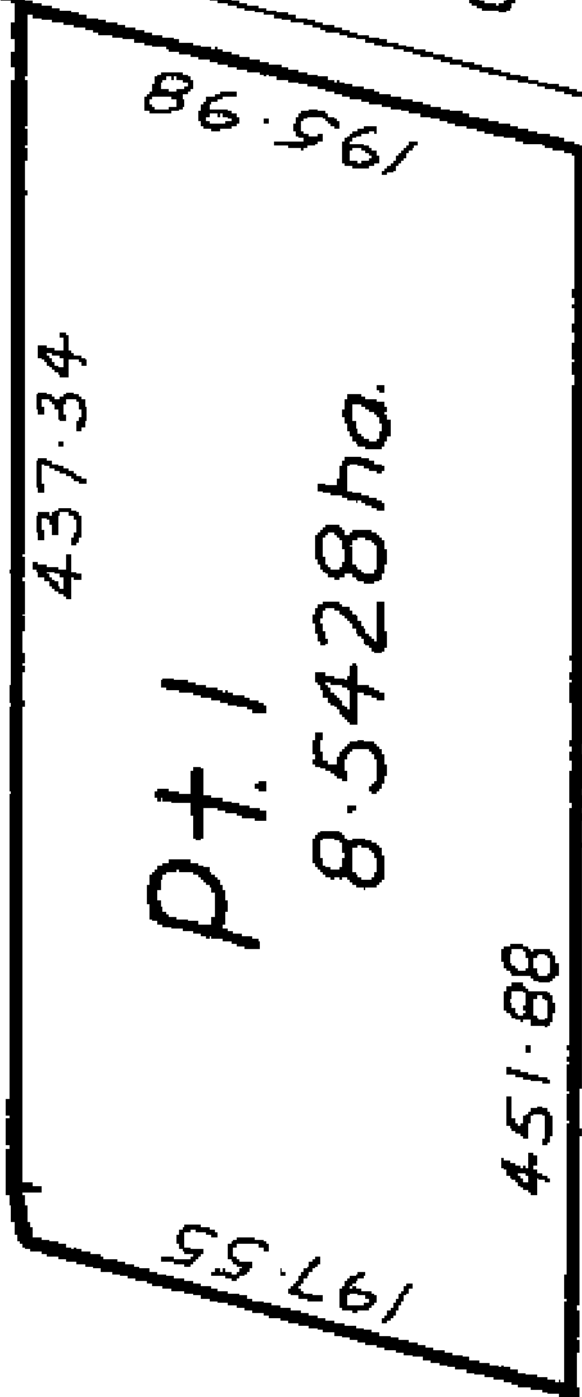
Firdale Farms Limited

Interests

Subject to Section 206 Land Act 1924

10852722.1 Mortgage to Rabobank New Zealand Limited - 9.8.2017 at 9:06 am

Dobbie Rd



Tramway Rd. East