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Provision	What the notified plan said	What B+LNZ submitted		ment Sout	ng all submi thland's reco ng panel (s42	ommend	ations to the	Some ideas for farmers to consider in their hearing statement
Stock exclusion Policy 18 Rule 70	Sheep not included in this rule Stock (not sheep) must be excluded from all water bodies by these deadlines: Stock type Exclusion date Cattle 1 May 2018 for cattle Deer 1 May 2020 • Except within hill country/ bedrock physiographic zone when slope is greater than 16° For more information, read: Policy 18, Southland Land and Water Plan Part A, page 94 Rule 70, Southland Land and Water Plan Part A, page 94	 Extend timeframes out to 2025 Apply 16-degree exemption to all physiographic zones, not just bedrock/ hill country Support that sheep not included in this rule 	Deadl ine Water body type For more about wi	Slope 0-3° 1 July 2025 All waterb odies information ter grazin	Slope 3-15° 1 July 2030 Waterb odies larger than 1 m wide	Slope > 15° N/A	Where break feeding 1 July 2022 All waterbod ies	 You may want to discuss both the notified rule and the s42A recommendations in your hearing statement. The s42A recommendations appear to be more lenient than the notified rule. Think about what the stock exclusion rules mean for you/ your farming business? Say what you like and/or don't like If you don't support this rule, can you identify other ways that you could reduce sediment and pathogen discharge into waterways. What evidence can you show to bring your story to life for the hearing commissioners?
Physiographic zones Polices 4-12 Physiograp hic Zones Map Series 4	 Environment Southland has separated the region into nine physiographic zones. The zones are determined by factors such as climate, topography, geology, and soil type. The idea is that land use within each zone has a different influence and different risk factors on water quality. Different rules apply in some physiographic zones. For more information, look at: Physiographic Zones, Southland Land and Water Plan Part A, pages 18-21 Physiographic Zone Policies, Southland Land and Water Plan Part A, pages 26-28 Physiographic Zones Map Series 4 	 Support the principle behind physiographic maps. However, council is trying to use the physiographic zones maps (regional scale) at the farm scale level. Continue to use physiographic information to inform discussions on catchment limits, farm plans and/ or resource consents. However, remove physiographic zone maps from the Plan to enable amendments without a Plan Change being required. 		Physiograp	phic zones ar	e retaine	ed in the Plan	 Do the notified physiographic zones match what you know about your farm? Farmers know their soils – if the physiographic zones don't match what you know about your property – tell the commissioners. Use maps and photographs to point out where the differences are. Explain to the commissioners how you manage your soils to mitigate environmental effects, and where this is different from what you would be required to do under the notified plan The key thing here is to show whether there is a more efficient way to manage land and water than through regional scale physiographic zone maps. To do this as a sector we need to show where there are errors in the physiographic zone maps and what impact this will have on how you manage those areas of your farm.



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Intensive Winter grazing Policy 16 Rule 23 Glossary	Area of winter grazing allowed without resource consent • Up to 20 ha of winter grazing permitted in 'high risk' physiographic zones. • Up to 50 ha of winter grazing permitted in 'other' physiographic zones • Broad definition captures many crop types Setback distances • Vegetation buffers must be maintained (and stock excluded) between intensive winter grazing paddocks and waterways. The buffer distances are: For more information, look at: Policy 16, Southland Land and Water Plan Part A, page 30 Rule 23, Southland Land and Water Plan Part A, pages 52-53 Glossary, Southland Land and Water Plan Part A, page 110	Area of winter grazing allowed without resource consent On extensive farms, allow up to 10 percent of property. On smaller farms maintain 50 ha threshold. Definition of intensive winter grazing Make the definition narrower, so pasture and cereal crops are excluded from intensive winter grazing rules. Setback distanced The proposed buffer distances are not practical on-ground As an alternative to the notified rule, use Farm Environment Plans to manage cultivation on slopes up to 30 degrees.	Area of winter grazing allowed without resource consent • Up to 50 hectares of intensive winter grazing per landholding; Definition of intensive winter grazing • "grazing of stock between May and September (inclusive) on forage crops, excluding pasture and cereal crops." Setback distances • Vegetation buffers must be maintained (and stock excluded) between intensive winter grazing paddocks and waterways. The buffer distances are: • If a permanent fence between winter grazing and the bed was established before 3 June 2016, then: - If no permanent fence, then - T9° slope • If outside of these parameters, winter grazing is a controlled activity (i.e. resource consent required) and Farm Environment Plan must be prepared. For more information on winter grazing, look at:	Famers may want to reflect on both the notified rule and the amendments proposed through the s42A report. • The definition of winter grazing in the s42A report appears to be more appropriate. • However, the s42A report recommendations for setback distances appear overly restrictive, especially the permanent fence requirement. • Think about: • How the different intensive winter grazing requirements will affect you. Do you like or dislike what is written in the notified Plan and/or s42A report? • Do you have a better alternative? Why is your alternative better? • If you don't support this rule, can you identify other ways that you could reduce sediment and pathogen discharge into waterways. • What evidence can you show to bring your story to life for the hearing commissioners?
			Pages 277 to 302 of the s42A report	
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Subsurface drains Policy 30 Rule 13 Appendix N	 You must map new tile drains, and when you upgrade or undergo maintenance of existing tile drains. This map must include the drain location, and the drain outlet's relative depth and position. This requirement can be managed using a Farm Environment Plan Within intensive winter grazing – all subsurface drains must be mapped and provided to Environment Southland on request. Discharge – there must be no noticeable change in receiving waters 20 meters from the tile drains discharge point. For more information, look at: Policy 30, Southland Land and Water Plan Part A, page 36 Rule 13, Southland Land and Water Plan Part A, page 45 Appendix N, Southland Land and Water Plan Part A, pages 198 to 202 	 The requirement to map only new/ maintained drains is a reasonable approach and is supported by B+LNZ Require mapping of only new/ recently maintained tile drains within intensive winter grazing areas. 	Added a requirement to rule 13 – farmers must map all existing drains, including the location of the outlet position and provide this information to Environment Southland upon request.	 The s42A report recommendations appear more draconian than what was notified in the Plan. It requires all drains to be mapped; not just when new drains are installed. Think about: How will the different subsurface drain requirements affect you? Do you like or dislike what is written in the notified Plan and/or s42A report? Do you have a better alternative? Why is your alternative better? If you don't support this rule, can you identify other ways that you could reduce sediment and pathogen discharge into waterways. What evidence can you show to bring your story to life for the hearing commissioners?





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Cultivation on slopes Rule 25 Glossary	 Cultivation on sloping land remains a permitted activity if it can meet the following waterway buffer zone requirements: Andcultivation does not occur above 700 metres above mean sea level, or mechanical cultivation on land with a slope greater than 20 degrees. Farmers will be required to develop a cultivation plan as part of their farm environment plan. For more information, look at: Rule 25, Southland Land and Water Plan Part A, page 54 Appendix N, Southland Land and Water Plan Part A, pages 198 to 202 	 Clarify how to accurately measure slope to ensure compliance with the rules. Extend the slope buffer distances to better reflect on-ground practices. Use: 3 metres from the outer edge of the bed on land with a slope up to 10 degrees 10 metres from the outer edge of the bed on land with a slope between 10 to 20 degrees 15 metres from the outer edge of the bed on land with a slope of between 20 and 30 degrees Use a Farm Environment Plan, not resource consent to cultivate steeper slopes. Definition Amend definition to remove non-mechanical cultivation techniques: 	Amend rule 25 to include these parts: - No mechanical cultivation on land steeper than 20 degrees or other cultivation on land steeper than 25 degrees - cultivation, that does not meet rule requirements is a controlled activity.	Famers may want to reflect on both the notified rule and the amendments proposed through the s42A report. • Will the increased requirements (through the s42A recommendations) to map all drains result in better water quality outcomes on your property? Why/ why not? • Do you have a better alternative? Why is your alternative better? • If you don't support this rule, can you identify other ways that you could reduce sediment and pathogen discharge into waterways. • What evidence can you show to bring your story to life for the hearing commissioners?



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Farm Environment Plans Appendix N Rule 20	 Triggers to develop a Farm Environment Plan (FEP) Many farmers will be required to develop a farm environment plan for their property. The key triggers for sheep and beef farmers are likely to be: Rule 20 – farming Rule 23 – Intensive winter grazing Rule 20, as notified, separates the timeframes for FEPs by physiographic zone, and sets the framework for managing dairying and intensive winter grazing separately to other farming activities. Farmers operating in 'higher risk' physiographic zones will be required to develop their farm environment plans first – see rule 20 A number of farms operate across physiographic zones, which will cause different mandatory start dates for different sections of their property. Farmers will be required to review and update their farm management plans each year, and each plan will run from 1 June to 31 May. A Farm Environment Plan will need to contain: Physical address, description of ownership etc. A map that shows: Property boundaries; significant farm infrastructure; critical source areas; physiographic unit, waterways; subsurface drainage (depth, location, outlet position); stock crossings/ access to waterways; heritage sites; significant indigenous biodiversity; A nutrient budget; Good Management Practices that will be implemented each year; 	 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. Farmers should not need a resource consent for matters that are addressed in their Farm Environment Plan. Amend thresholds and timelines to support the adoption of Farm Environment Plans without the requirement for resource consent. Align all consent requirements, thresholds and timings with Farm Environment Plan development to ensure the focus is on outcomes and planning efficiency. 	staging through Rule 20 and 23 should be amended. Agree that for those farmers on multiple physiographic zones, staging by physiographic zone is overly complex. Instead, recommend amending Rule 20 so that FEPs are staged by Freshwater Management Unit (FMU). A Farm Environment Plan will need to contain: Physical address, description of ownership etc. A map that shows: Property boundaries; significant farm infrastructure; critical source areas; physiographic unit, waterways; subsurface drainage (depth, location, outlet position); stock crossings/ access to waterways; heritage sites; significant indigenous biodiversity; cultivation planned for the next12 months; intensive winter grazing; buffer strips along waterways; land with slope >9 degrees within cultivated areas; dispersal location and application rate of silage leachate, animal or vegetative waste A nutrient budget – except on sheep, beef and deer farming without dairy support and no more than 20 ha of intensive winter grazing Good Management Practices that will be implemented each year; Key transport pathways and contaminants for each of the physiographic zones within the property; Irrigation maps and records. For more information on winter grazing, look at: Pages 252 to 269 of the s42A report	Famers may want to reflect on both the notified rule and the amendments proposed through the s42A report. • Appears that the s42A recommendations will require fewer sheep and beef farmers to get nutrient budget – have these recommendations gone far enough? • Staging by FMU seems easier to manage and understand. How will you be affected by the different timeline? • Think about • Will the FEP requirements result in practical on-ground change? Why/ why not? • If you don't support FEPs, or part of the FEP requirements, can you identify other ways that you could reduce sediment and pathogen discharge into waterways. • Do you have a better afternative? Why is your afternative better? • What evidence can you show to bring your story to life for the hearing commissioners?





Key transport pathways and contaminants for each of the physiographic zones within the property;		
A Riparian Management Plan in written and/or map form;		
A cultivation map;		
A plan for any areas of intensive winter grazing; and		
Irrigation maps and records.		
Nutrient budget reviews - Farmers will be required to complete an annual review of their nutrient budget input data.		
Rule 20, Southland Land and Water Plan Part A, pages 49-51		
Appendix N, Southland Land and Water Plan Part A, pages 198 to 202		