View Submitter Details

Submitter No.	S95
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Online submitter	Yes
Raw submission lodged	Yes

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S95.1	Method M44: Supporting the health of rural waterbodies.	Support	Please prioritise this work prior to implementing new rules.	Happy with the range of financial support options for land retirement that are proposed, including rates relief but I would also like to see included compensation if large-scale land retirement progresses. I am also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1's sediment and erosion control policies and rules.
S95.2	Method M44: Supporting the health of rural waterbodies.	Amend	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.	The lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which we believe are not fit for purpose. The lack of real data also makes it difficult for us to see where the water quality issue is and therefore decide what solutions to implement on-farm.
S95.3	Method M44: Supporting the health of rural waterbodies.	Amend	Add "Incorporate e- coli reduction in catchment context and farm plans, based on monitored data" – to allow a farm-scale approach as already proposed for nitrogen and sediment.	Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Work to reduce e-coli levels should only target areas where e-coli is shown to be an issue. There is not currently sufficient monitoring data to determine the levels and sources of e-coli across the area's multiple catchments. It is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu, given the diversity in catchments/sub-catchments. Local water quality studies need to be carried out and the option for landowner-led, farm-scale monitoring provided for – including feedback loops to monitor the impact of actions taken.
S95.4	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Identify sediment sources by using a farm-scale assessment rather than the erosion-risk mapping proposed. Refocus this section on identifying "sediment sources" rather than solely erosion risk.	The PC1 mapping does not correspond well with ground- truthed information on erosion from people who have worked with the land for multiple generations. We are concerned about both the accuracy of the modelling and that it might not include accurate analysis of soil types. The modelling is coarse and is not fit for purpose in Mākara/Ohariu. The policy needs to allow for a much more accurate assessment of sediment loss risk on individual farms by using a farm-scale assessment of sediment sources. This policy includes generic assumptions on the source of sediment. We are concerned that PC1 focuses on hill country erosion as a source of sediment and not streambank erosion resulting from high flow events – anecdotally a much higher contributor to sediment loss. We do support revegetation of vulnerable areas of farmland in order to reduce flood flows and streambank erosion – but there are multiple options for revegetation sites that best work within the farm system. The area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.
S95.5	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Refocus from "erosion risk" to "sediment management".	s per above, the sources of sediment are likely broader than erosion on hillsides. Focusing on the broader topic of "sediment" will also acknowledge the role of other existing sediment management techniques such as low stocking rates and maintaining good pasture cover.
S95.6	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be indentifed through farm-scale assessment, including through audited Freshwater Farm Plans.	This provision will financially cripple many farms given the large area, timeframes and requirement to retire the land from grazing. The removal of vegetation from this landscape occurred many generations ago yet the revegetation is required to be implemented by current owners within a short timeframe. The "woody vegetation" will likely need to be natural revesion in our landscape since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas that have been mapped. This is due to the extremely high winds - and based on people's own trial work to date. Accordingly, fencing and retiring the land will be the only tool available. Our hills have unique challenges with revegetation projects, in large part due to the high winds. Native planting will not be affordable on this scale and natural reversion in these most exposed areas will take a very long time to establish, including a significant transition time through gorse, creating a seed source for a pest that we work hard to control. The provision's requirement to "maintain" the woody vegetation will be unviable, given the large- scale land retirement and reduced farm income from reduced production and high fencing costs incurred. The policy relies on modelling that we believe is inaccurate. It makes no sense to retire farmland where there is no actual erosion issue.
S95.7	Policy WH.P26: Managing livestock access to small rivers.	Amend	Replace "restrict" with "reduce through non- regulatory means". Amend the policy wording to match the heading scope about river size.	Make this policy consistent with the associated rule regarding reduced access rather than restricted access. We support revegetating streams but are limited by the high number of small streams in our extremely hilly landscape, and therefore the high cost and the practicality of fencing some of these areas, especially in areas with consecutive gullies or in areas that are flood zones.
S95.8	Rule WH.R28: Livestock access to a small river – permitted activity.	Oppose	Remove since this can instead be incorporate into certified/audited Freshwater Farm Plans as catchment context.	There is a risk of increased animal welfare issues if livestock do not have access to streams for drinking water, due to the regular risk around reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach would help identify solutions such as ponds for stockwater and sediment retention.

Raw submission documents

These are files that were uploaded as part of an online submission.

Document name	File	Description	Upload date
No data			