Group submission on NRP Plan Change 1 – owners of Mākara and Ohariu large pastoral farms

15 December 2023

This submission is made by the majority of farmers in the Mākara/Ohariu community with over 20 hectares of pastoral land on their property. It complements individual submissions being made separately by several members of this group.

We do not support the Plan Change 1 in its current form and we seek several changes. Some of the requested changes are provided at a high-level in this document and others are detailed in the submission form against specific provisions. This is not a comprehensive list of desired changes and many others will be included in our members' individual submissions.

Please note that much of our feedback echoes the feedback that several of us have previously provided via the Whaitua process.

Many of us have been farming in Mākara or Ohariu for multiple generations and we all have a deep care for the land. We are proud that our farms help feed the wider community and also support both our families and the local communities of Mākara and Ohariu to thrive. We are committed to looking after our land and water and we want to continue to progress work on our properties where we know it will directly improve water quality and biodiversity.

In the last five years, our small community has retired over 600 hectares of coastal or steep with reverting native vegetation and planted over 60,000 native plants in wetlands, along streams and hillsides. We have planted 3,000 poplar and willow trees to reduce streambank erosion and shade the stream. We have excluded livestock from over 3 kilometers of stream and fenced 15 kilometers of gullies or eroding coastal cliffs. Some of us have been doing this work with no council support and others have received advice and funding support to help us do more than we could have otherwise.

We strongly oppose the broadbrush regulatory approach taken under Plan Change 1 and the removal of local decision-making from our community. We agree with the need to improve water quality – where it is shown to be poor and where the solutions are within our control – but we need some fundamental information to do this effectively and equitably. We ask council to recognise the work we have done to date and partner with us in this work rather than regulate us.

General Comments

1. **Consultation process.** Most of us only heard about the Plan Change through community channels when a GWRC presentation in Ohariu was organised 2.5 weeks before submissions closed. We are extremely disappointed by the lack of GWRC's community engagement to consult on this Plan Change, particularly given the significant and direct impact that the proposed changes will have on us. We have identified several GWRC communication opportunities that were missed and would have helped us engage:

    a. Direct mail contact with rural property owners, identified through council's rating database;
    b. Formal engagement with our Community Board; and

c. Provision of information on the council's website – more readily accessible written information, invitation to the PC1 rural webinars/meeting.

The Plan Change document itself is difficult for most people to understand and requires more time than we have available. Accordingly, additional forms of communication are essential if GWRC really wants meaningful community feedback.

We also note that the timing of consultation falls at an incredibly busy time – both in the farm calendar and just before Christmas.

2. **Cost implications.** The cost of implementing the proposed changes on farms will be very high and will significantly impact farm viability and our livelihoods. Unlike the PC1 changes that impact urban areas, the financial implications fall directly to a small number of individual landowners in rural communities. The Plan Change does not give us the flexibility to stage the work, unlike the urban three waters network where many costs can be dispersed through rates increases / council debt over time. We expect the proposed changes will significantly devalue our properties given the high cost of implementation and the reduction in farm incomes. We ask that council first and foremost remove PC1's regulatory approach proposed. If this does not occur, then we expect council to provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.

3. **Ability to make meaningful change.** We currently do not have sufficient information to know where water quality is a problem and therefore how to effectively target our work. We do not want our activities to create high levels of sediment and e-coli in the streams but there is almost no real data to show the source of these contaminants (either by activity or location) and we are unaware of the natural levels in our specific area. We only have one water quality monitoring site across Mākara and Ohariu's full 15,000 hectares and it only relates to the 8,000 hectare Mākara Stream catchment. We believe that many of our smaller streams, both within and outside the Mākara Stream catchment, have good water quality – yet stringent landuse rules will still apply. We believe PC1 addresses this lack of local water quality information by bluntly proposing broad rules across multiple catchments instead of seeking to target interventions for the best outcomes. As a result, the proposed regulatory implications are wide-reaching, create huge social and financial cost and risk not achieving the outcomes efficiently. We request GWRC take a farm-scale and catchment-scale approach, rather than across a whaitua or Freshwater Management Unit. This will better acknowledge the fact that solutions are best tailored to the unique landscape and characteristics of indiviudal farms and that streams cross property boundaries.

4. **Criminalising versus empowering the community.** We are concerned that the scale of the current PC1 provisions means many people will be non-compliant within a short timeframe and find themselves faced with prosecution. The transition time between current land use and implementing the proposed changes is very short considering the huge financial implications, farm system change required and land use change required. We ask GWRC to take an approach less based on blanket rules, modelled scenarios and enforcement and more on empowering, informing and partnering with the community. We believe this approach is respectful of people and can deliver the same water quality outcomes.

Please find our additional submission points linked to individual PC1 provisions, attached.

Submitters

Ohariu

Gavin Bruce, Mill Creek
Warren Bryant, Huia Farm
Hamish Best
Ward Kellahan, Tussock Ridge
Annette Phillips
Wayne Stewart
Tom Eastwick, Papanui Station
Dan Stevenson, Pikarere Farm
Bede Crestani
Mark Best
Sharyn Hume, Sam Ellingham, Paul Weeks, Vicki Weeks, John Hume, Liz Hume
Grant and Caroline Burdan
Darren Hoskins, Mākara/Ohariu Community Board

Mākara

Michael Grace and Guy Parkinson, Terawhiti Station
Maryanne Gill, Ged Gill, Nicole Gill, Kirsty Gill and Luke O'Connell, Horse Park
Sue and Phil Hawkins
Kim and John Bowen
Jack and Jill Fenaughty, Riu Huna Farm
John Easther
Este and Jon Thompson, Otari Farms
Kate Foot and Michael Kooiman - Gateway Holding Company Limited
Michael Kooiman, Dominium Ltd
Rorie Kooiman, Makara Fern Ltd

Comments on Specific PC1 Provisions

Provision	Support / Oppose / Amend	Decision Sought	Reasons
Methods			
Method M44: Supporting the health of rural waterbodies	Support	We ask GWRC to prioritise this work prior to implementing new rules.	We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses. We are 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.
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.
Policies			

Policy WH.P21 (e-coli)	Amend	Add "Identification of sources of e-coli specific to individual catchments".	The source of high e-coli levels in the Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue.
Policy WH.P21 (e-coli)	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.
Policy WH.P23 (a) (sediment – identifying high risk land)	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 <u>risk</u> 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.
Policy WH.P23 (b) (Sediment – Erosion Risk Mgt Plans)	Amend	Refocus from "erosion risk" to "sediment management".	As 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.
Policy WH.P23 (c) (Sediment – requirement for revegetation)	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be indentified 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. Another challenge to revegetation projects is working alongside Meridian's wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow. The policy relies on modelling that we believe is inaccurate. It makes no sense to retire farmland where there is no actual erosion issue.
Policy WH.P26 (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. Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. 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.
Policy WH.P27 (Promoting stream shading)	Support		We recognise the value of riparian planting of both natives and poplar/willows for shade and many of us have been actively delivering this work to date. In our area, planting for shade will often also help with streambank stabilisation.
Rules			
Rule WH.R27 (Farming activities on 20+ ha)	Amend	Ensure that the details of this rule are consistent with the content and timeframes for Freshwater Farm Plans	We do not want to double up on farm plan work when an existing process is already in play under national regulations.
Rule WH.R28 and R29 (Access to small rivers)	Oppose	Remove since this can instead be incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.

View Submitter Details

Submitter No.	S51
Submitter Name	Mākara and Ohariu large farms
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
S51.1	Method M44: Supporting the health of rural waterbodies.	Support	We ask GWRC to prioritise this work prior to implementing new rules.	We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses. We are 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.
S51.2	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.
S51.3	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Add "Identification of sources of e-coli specific to individual catchments".	The source of high e-coli levels in the Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue.
S51.4	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	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.
S51.5	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Amend section (a). 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.
S51.6	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Amend section (b). Refocus from "erosion risk" to "sediment management".	As per submission points for (a), 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.
S51.7	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Oppose section (c). Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified 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. Another challenge to revegetation projects is working alongside Meridian's wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow. The policy relies on modelling that we believe is inaccurate. It makes no sense to retire farmland where there is no actual erosion issue

S51.8	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. Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. 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.
S51.9	Policy WH.P27: Promoting stream shading.	Support	Retain	We recognise the value of riparian planting of both natives and poplar/willows for shade and many of us have been actively delivering this work to date. In our area, planting for shade will often also help with streambank stabilisation.
S51.10	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	Amend	Ensure that the details of this rule are consistent with the content and timeframes for Freshwater Farm Plans.	We do not want to double up on farm plan work when an existing process is already in play under national regulations.
S51.11	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.	Also refer to comments against Policy WH.P26 and WH.P29.
S51.12	Rule WH.R29: Livestock access to a small river – discretionary activity.	Oppose	Remove since this can instead be incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26 and WH.P28.

Raw submission documents

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

Document name	File	Description	Upload date
PC1 submission letter from owners of large farms in Mākara and Ohariu	pc1submissionmakaraandohariufarmers.pdf		15/12/2023 10:04