

Proposed Natural Resources Plan:

Submitter:

**Kairoa Farms Limited**

Submitter Number:

**S74**



**SUBMISSION on the proposed Natural Resources Plan for the Wellington Region**

To: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz) OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

<b>Name</b>	<i>Kairoa Farms Ltd – Neil and Martina Day</i>
<b>Farm Name</b>	<i>Kairoa</i>
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**Communication from GWRC:** *I prefer email OR hardmail – choose one Email*

**Trade competition:** *I could not gain an advantage in trade competition through the submission*

**Hearing:** *I wish to be heard and would consider jointly appearing with other submitters - no*

**Support:** *I support Wairarapa Federated Farmers submission*

**INTRODUCTION – Key Points about farm/business**

<b>Farm Type</b>	<i>Dairy</i>
<b>Farm size (area)</b>	<b>154</b> hectares
<b>Main Waterways</b>	
<b>GW Soil plan or Farm Plan</b>	<i>No Refused to sign without amendments being made, and GWRC never came back to us.</i>
<b>Environmental investments</b>	<i>All riparian planting completed, thus troughs and water lines placed, fencing completed. Effluent pond to be completed by 2017.</i>
<b>QE2 or Retirement Blocks</b>	
<b>General Comments</b>	<i>We are finding the current GWRC staff very “green” types, not practical or helpful to contribute to our business. EG We don’t need to plant eucalypts for coppicing for firewood ( which we did as enthusiastic 20 yr olds) in our riparian plantings as they are brittle and provide little shelter in this windy area, not do we want to fence off “8 m on each side of our river and perhaps give that couple of acres over there to the neighbor” and plant multiple wetlands everywhere.</i>

## **STOCK EXCLUSION**

### **Specific Provisions that my submission relates to are:**

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022
- Stock access to Category Three waterbodies – permitted subject to conditions, e.g. crossings

**My submission is: ~~support~~/oppose**

### **I seek the following changes:**

Extend the timeframes, e.g. Category One by 2020, Category Two by 2025

Exclude sheep from Category One

Exclude water races and drains from Category Two

Delete requirement for dairy cow exclusion from hill country rivers > 1 metre

Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.

Specify criteria for “important” trout spawning rivers; delete those that don’t meet the criteria

Amend the definitions of stock crossing to match hill country practicalities and effects

Allow for stock drinking points

Ensure that alternative stock water supplies are available and rules don’t apply until they are.

#### **Stock Exclusion Comments and Reasons**

*It would not be practical for hill farms to fence off all waterways.*

*Water races are a fantastic scheme designed to make water available to areas where water is unavailable. Could areas where water races re-enter rivers not be planted with specially designed wetlands thus solving water quality problems.*

## **WETLANDS**

### **Specific Provisions that my submission relates to are:**

Interpretation: definition of natural wetland and significant natural wetlands

Schedule F3: significant wetlands

Rule 105: Planting in wetlands - approved native plants only

Rule 106: Restoration of natural or significant wetlands – controlled if Wetland Management Plan

Rule 107: Activities in natural or significant wetlands – discretionary

Rule 108: Activities in wetlands - non-complying, including diversion of water into a natural wetland

**My submission is: ~~support~~/oppose**

### **I seek the following changes:**

Natural wetlands: Natural wetlands: amend to exclude intermittent and ephemeral water bodies, and clarify these do not include hill country seeps or paddocks subject to regular ponding, dominated by cultivated pasture, whether or not associated with sedge, raupo or rush species.

Significant wetlands: re-prioritise to focus efforts on the highest value sites; change minimum size from 0.1ha to 1.0ha

Rule 104: allow use of machines rather than just hand held

Rule 105: allow for planting introduced species for bees or ducks

Rule 106, 107: amend to provide for restoration or enhancement of wetlands to be a permitted activity, with plans prepared as a non-regulatory partnership.

Rule 108: Allow diversion of water as part of a restoration plan

### ***Wetlands Comments and Reasons***

**FARM EFFLUENT**

**Specific Provisions that my submission relates to are:**

Rule 83: Discharge of collected animal effluent to land – controlled

Rule 93: effluent to land in supply protection area – discretionary

Map 27: groundwater community drinking water supply protection areas

**My submission is: ~~support~~/oppose**

**I seek the following changes:**

Undertake more rigorous regional cost-benefit analysis of pond storage and sealing requirements prior to the hearing to support proper consideration by the Hearing Commissioners.

Provide reasonable timeframes and a stepped approach for the installation of storage (e.g. 3-5 years)

Clarify the definition of ponding; and exclude extreme weather events, breakdowns occurring out of manager's control, be consistent with urban conditions.

In groundwater protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

Extend the consent timeframe to 20 years to reflect the investment made

**Effluent Comment and Reasons**

*A huge cost to individual businesses.*

## SILAGE

### Specific Provisions that my submission relates to are:

Definition: a fermented high moisture stored fodder

Rule R90: manufacture and storage of silage and compost, including

- Condition a) the manufacture and storage area shall not be located within 20m of a surface water body ( stream, drain, water race and intermittently flowing streams)
- Condition d) the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water

**My submission is: support/oppose**

**I seek the following changes:**

Delete the requirement for impermeable lining; retain the condition that there be no discharge to water

Delete the requirement for location not allowed within 20m of a surface water body (not needed due to no discharge condition above)

Change the definition to specify this does not include baleage

#### **Silage Comments and Reasons**

*There is a low risk from wilted silage – if properly prepared the amount of leachate is negligible.; costs for impermeable lining would be huge.*

*Cost Benefit analysis has not included any clear evidence of the benefits outweighing the costs.*

*Difficulty in dealing with surplus years – filled up the main stack but still have extra. This rule will make us turn to baleage that is twice as expensive and has the plastic disposal issues.*

*There would be much more than just the cost of the lining. The area would be a huge catchment for rainfall, thus the storing of that and the associated dispersal system – would that require power to those sites plus a whole accompanying set of pumps and pipes.*

## **CULTIVATION & BREAKFEEDING**

**Specific Provisions that my submission relates to are:**

Rule 94: Cultivation & Rule 95: Break feeding

- Cultivation/ break feeding shall not occur within 5m of a surface waterbody, including open drains and water races

**My submission is: ~~support~~/oppose**

**I seek the following changes:**

Delete the conditions requiring 5m setbacks

**Cultivation/Breakfeeding Comments and Reasons**



## DRAIN CLEANING

### Specific Provisions that my submission relates to are:

Definition of highly modified watercourse:

- Modified and channeled to the extent it has the characteristics of a drain, including that: the channel is a single flow, straight, no curves, mechanically formed with straight or steep banks, maintained to keep the watertable at least 0.3m below the pasture root zone, and it exhibits these characteristics for the entire length of the property

Rule 121: Maintenance of drains and highly modified streams; *and*

Rule 122: Removing vegetation from the bed of any river; *same conditions for both*

- any fish shall be returned no later than one hour
- only one side shall be cleared at any one time, and the other side three months later; or, only the middle shall be cleared, leaving no less than 0.3m each side
  - for drains and highly modified streams, this condition applies from July 2017

Method M14: Maintenance of drains

- GWRC will develop an education programme in collaboration with industry and other stakeholders to support implementation of Rule 121

**My submission is: ~~support~~/oppose**

**I seek the following changes:**

Change the definition of highly modified stream to include all streams that have been modified by human activity – straightening, deepening, channeling.

Provide high resolution maps in the plan, clearly showing drains and highly modified streams that are covered by Rule 121. This is required before the hearing to see the scale of the issue.

Provide direction to landowners about the type of waterways on their land.

Fast-forward Method 14 to develop agreed good practice for drain cleaning to inform the Hearing Commissioners consideration of the proposed rules.

Extend the timeframe for the implementation of the new conditions from 2017 to 2020

### ***Drain Cleaning Comments and Reasons***

*costs, practicalities, historical modification not recognized. Most of our drains are fenced, cleaning will be necessary as they will be clogged with vegetation and cause flooding.*

## **EARTHWORKS**

### **Specific Provisions that my submission relates to are:**

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000m<sup>2</sup> per property per 12 months – permitted

Rule 101: earthworks that doesn't meet permitted conditions - discretionary

**My submission is: support/oppose**

**I seek the following changes:**

Amend the definition and Rule 99 to allow construction of farm tracks as a permitted activity, as well as maintenance.

Change Rule 101 to controlled or restricted discretionary with clear conditions

### **Earthworks comments and reasons**

*. operational and farm safety aspects*

*Note the word "contiguous" is important in thinking about impact*

## VEGETATION CLEARANCE on Erosion-Prone Land

### Specific Provisions that my submission relates to are:

Definition of erosion-prone: slope >20 degrees

Definition of vegetation clearance: clearance of woody vegetation (exotic or native) by mechanical or chemical means including felling, spraying by hand or aerial means, hand clearance and burning

Rule R100: vegetation clearance on erosion-prone land

- contiguous area up to 2ha per property per 12 months– permitted

Rule 101: vegetation clearance that doesn't meet permitted conditions - discretionary

**My submission is: ~~support~~/oppose**

### I seek the following changes:

Change definition of erosion prone to increase the slope, and exclude stable substrate, e.g. greywacke

Change definition of vegetation clearance to exclude hand clearance, hand or aerial spraying and roller crushing

Change Rule 101 to controlled or restricted discretionary with clear conditions

**Vegetation Clearance comments and reasons** *confusion with different slope triggers.*

## CULVERTS & BRIDGES

### Specific Provisions that my submission relates to are:

Rule R114: weirs, fords, small bridges – permitted if

- not >20m<sup>2</sup> in size / footprint
- catchment not >50ha west of the Ruamahanga, 200ha east of the Ruamahanga

Rule R115: culverts – permitted if

- not >20m length and not >0.3m-1.2m diameter

Rule 125: small river crossings, dams, structures in a mana whenua site – restricted discretionary

**My submission is: ~~support~~/oppose**

### I seek the following changes:

Rule R114: Change the 50ha catchment restriction to 200ha (or clarify rationale for the difference)

- Increase the size for fords and bridges (20m<sup>2</sup> too small)

Rule R115: delete the condition restricting culvert diameter; retain condition that the culvert be constructed to allow for 20 year flood event.

- Provide advice to landowner of appropriate culvert sizes to achieve the above condition

Mana whenua sites: undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself – not leaving this to a consent process at landowner cost

#### **Culverts/Bridges comments and reasons**

*fords/crossings good alternative method to constructing structures especially where use is infrequent or risks of structure outweigh the impact of a ford.*

*We have 3 days grazing over the river which doesn't justify a \$60-100,000 bridge when we go there once every 24 days.*

## **OFFAL PITS, FARM REFUSE DUMPS**

### **Specific Provisions that my submission relates to are:**

Rule 89: Farm Refuse Dumps – 15 conditions

Rule 91: Offal Pit – 9 conditions

**My submission is: ~~support~~/oppose**

### **I seek the following changes:**

Rule 89: Farm Refuse Dumps

- increase size from 50m<sup>3</sup> to 100m<sup>3</sup>
- heavily prune the fourteen other conditions to focus on clear effects

Rule 91: Offal Pits

- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary
- heavily prune the other seven conditions to focus on effects

### **Offal Pits/Refuse Dumps Comments and Reasons**

*these are an existing activity on farms and do not cause adverse effects so do not need multiple conditions.*

## AGRI-CHEMICALS

### Specific Provisions that my submission relates to are:

Rule 36: Agrichemicals – permitted activity conditions relating to aerial and vehicle based spraying

- (e) no discharge within a community drinking water supply protection area
- (g) spray plan must be prepared once pa
  - identify sensitive areas (dwelling house, schools, amenity areas, non-target crops sensitive to agchem, organically certified properties, surface water bodies including natural wetlands and associated riparian vegetation, and significant and outstanding water bodies)
  - notify neighbours the spray plan is available on request
  - get written agreement from adjoining neighbours that notification is not required
  - supply a copy of the spray plan at least 24 hours prior to application, to the owner/occupier of sensitive areas or likely to be directly affected, or requests a copy

**My submission is: ~~support~~/oppose**

**I seek the following changes:**

Change condition g) to more reasonably reflect practicalities and risks

In water supply protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

#### **Agri-chemicals Comments and Reasons**

*provides a level of protection that is not associated with the risk, demands undue notification requirements when neighbours might not be affected.*

*Too complicated when all we want to do is spray a few thistles or ragwort on a sunny, windless day.*

## FERTILISER

### Specific Provisions that my submission relates to are:

Rule 82: Application of fertilizer – permitted activity, provided

Condition a) not into or onto a surface water body or beyond the boundary, including as a result of wind drift

**My submission is:** ~~support~~/oppose

### I seek the following changes:

Amend condition a) to reflect the practicalities of aerial fertiliser application

#### **Fertiliser Application Comments and Reasons**

*e.g. It is impossible to miss all intermittent surface waterbodies when using a plane or helicopter. Technology is being developed to allow this but it is not commercially available. Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.*

## STORM WATER

### Specific Provisions that my submission relates to are:

Rule R48: storm water from individual property permitted, except

- the discharge is not into an outstanding waterbody (e.g. Lake Wairarapa)
- concentration of total suspended solids does not exceed specified concentrations
  - 50g - 100g/m<sup>3</sup> or 20-33% change depending on “significance” of site

**My submission is: support/oppose**

**I seek the following changes:**

Rule R48: delete condition (a): no discharge into outstanding waterbodies

Delete condition (e) specifying suspended solid concentrations, retain condition (g) requiring no conspicuous films, scum, floatables etc

#### **Stormwater comments and reasons**

*This is totally impracticality, costs, this water is low risk. Would it require a consultants report to get consent?*

**Any other areas of concern – just copy format above**