

From: inthehills@ezykonec.co.nz
To: [Mailroom Mailbox](#)
Subject: Plan change7 to LWRP submission
Date: Thursday, 12 September 2019 8:31:31 PM

Please find attached my submission on Plan change 7.
I would like to say that the process was extremely difficult. Having documents as a PDF to download and use was not helpful - had to convert the pdf to a word file - that didn't work either so in the end made my own document in the same format.
cheers Hilary Iles

Submission on Plan change 7 from Hilary Iles

Background:

I live on a life style block of 6 hectares near the foothills of the 4 peaks. In the past we have had cows, sheep and horses. I've been a member of the Orari River Protection Group for 13 years. I have a Masters in Environmental Education. I moved to south island in 2006 and used to travel regularly between Geraldine and Christchurch for work. (And I had visited the south island many times before then, spending a lot of time in the mountains).

The Canterbury plains and Mackenzie basin were dry places grazed by sheep. Over several years more and more farms converted to dairy, turning the land to nitrogen green, removing shelter belts and installing centre pivots. A very intensive, highly stocked and fertilised system was and still is being created. One which required high inputs to maintain and a huge expense outlay. This way of farming has spread further and further up into the headwaters of the major rivers. I've witnessed this whilst tramping. Much of the native vegetation has been replaced and wetlands removed, land is grazed higher and higher up the mountains and more erosion is occurring. None of these practices are sustainable and the results for our rivers has been disastrous.

I was involved with the consultation process for the LWRP and have been waiting for 10 years for something to happen but all I've seen is continued deforestation, more conversions, poor water quality, more storage ponds, less river flow, loss of biodiversity and increased burning. All of which have contributed to NZs huge growth in the amount of CO2 emissions. Milk is not "feeding the world". We could be growing lentils and quinoa (much higher protein) in Canterbury. The region has perfect conditions as shown by the few people who do grow it and these crops use less water and lower inputs. In addition if farmers had less stock, they would need less inputs. If they changed some of their farming practices such as stopping the constant cycle of plough and reseed and instead developed good resilient deep soil structures under permanent mixed pastures they would lose less soil

through erosion, have healthier animals, save funding on nitrates and have happier less stressful life styles and animals.

In Plan Change 7, I support all of the changes but some could be stronger – see comments below. I do not think some of the changes go far enough yet towards healthier rivers but they are a start and should not be watered down!

So much of the success of Plan Change 7 depends on the “Farm environmental plans” But and this is a large but – Do all farms have them? Who monitors that? How can a system like this work unless there is monitoring. Do all farms know they are supposed to have one? Who works with deer farmers for instance – no one in our catchment group knew.

And that all farms know the rules and regulations that they are supposed to follow.

The time frame for implementing Plan Change 7 needs to be as short as possible – we have waited all these years seeing rivers get worse and worse and do not want further decline in the wait for the rules to be applied.

Proposed Plan		Support or oppose	Reason	Details
Section and page no.	Sub section			
Table 1A		Support		The outcomes for the water bodies need to be higher – for example the Alpine- lower – is just good to fair – it should all be good – if we can’t even get the water at the top end of the river system better – what hope have we for further

				downstream. Similarly with the hill fed -lower the objective should be good.
Table 1B		Support		High should be the outcome for all small to medium sized high country lakes. RE Māori Lakes and Lakes Emily and Georgina stock come down into the water and into the feeder streams and surrounding farms use a lot of nitrates to improve pasture so the water quality is poor. Fencing of the water ways and lakes with a good margin would be a solution.
4.31	a	Support/ however not the wording	Ideally all stock should be fenced out of waterways	Intensively farmed stock is to loose a definition and open to misinterpretation. There needs to be a rigorous definition of “intensively farmed “ – across all the livestock species.
4.31	ba &bb	Support		
4.31	c	Support if wording is changed	Should just say Sheep –	They are the only species that would not cause too much damage. But need to specify the stocking density
4.61	A	Support	Indigenous biological diversity is very important and needs preserving.	However how do people making the application know their effects on indigenous freshwater species – and what indigenous freshwater species they have, Where do they get the support from?

4.99		support	Providing a – g are adhered to	
4.100		support		
4.101		Support	But disagree with – having an a and b option	It would be extremely difficult to recreate a habitat with all of its macro and micro diversity.
4.102		Support	Indigenous fish are important parts of river ecosystems	They are important for the functioning of a natural ecosystem and providing ecosystem services
5.42	CB	Support	Need to control the contamination into ground water and surface water	
5.42	CC	Support		
5.42	CE	Support		
5.67	A	Support		However most of these sites are very small and discreet– leaving most of the river unprotected.
5.123		Support		
5.126		Support		
5.128		Support		
5.133		Support//sort of		Transferring the permit could also be an opportunity to reduce the water take where water quality needs improving..

				<p>So much depends on the farm management plans Farm environmental plans – Who monitors that all farmers have one? How can a system like this work unless there is monitoring. And ALL farms know what they are supposed to comply to</p> <p>And that all farms know the rules and regulations that they are supposed to follow</p> <p>14 – Freshwater outcomes. Time frames too long - should be shorter not 3 to 5 years to reach the water quality targets – good -fair etc – everything ideally should be heading for good – eg the Low alpine zone – is a very fragile area and should definitely be aiming for good.</p>