

## View Submitter Details

<b>Submitter No.</b>	S102
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<b>Online submitter</b>	Yes
<b>Raw submission lodged</b>	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
S102.1	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Remove the mandatory requirement for 50% of permanent woody vegetation	The science shared to date has indicated that while some of the sediment is from highest erosion risk land (pasture), the % was small and dwarfed by other sources. It is not clear that replacing pasture at low stocking rates (but enough to keep grasses low for fire reasons) with woody vegetation would not have a net negative outcome of sediment discharge.
S102.2	B Management objectives	Amend	(b) Define "land in a natural state"  (d) make revegetation optional	The land was heavily modified in the 1800s and the current vegetation cover on the highly exposed land has endured for decades. What is the "natural state"? Any attempt to modify, for example by adding additional vegetation, may have a net negative impact especially where there are shallow soils.
S102.3	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	Unless the science can be provided to support the claim that erosion is worse without woody vegetation delete this section.	Grass covered slopes might be prone to surface sediment runoff but woody vegetation experiencing high winds can often cause major soil disturbance with associated sediment release. Partially disturbed tree roots or rotting tree roots can provide a pathway for water ingress well below the surface which can initiate major landslides on the steeper country.
S102.4	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Oppose	The requirement E1 for 50% of total area in woody vegetation be removed or made optional.	It is not at all clear that replacing lightly stocked grassland with woody vegetation would achieve a net reduction in sediment, especially with high winds which make establishment of woody vegetation very challenging
S102.5	Table D1 Sediment loss and transport risk factors	Amend	add that the requirement for implementing effective control of plant and animal pests is also a requirement on Greater Wellington	There continues to be substantial damage from pig rooting where wild pigs are harbouring on Greater Wellington land. The extent of soil disturbance can be massive. There are related issues with wild deer. The Plan should make it clear that responsibility for wild animals involves multiple agencies including Greater Wellington.

S102.6	Method M44: Supporting the health of rural waterbodies.	Support	(c) support wording	I support promoting update of good management practice. There can be some confusion about where the boundary lies towards bad management practice (often historical perspective). While one guide is "GWRC Erosion and Sediment Control Guidelines for the Wellington Region (2021), to achieve the discharge standard" this seems to relate to earthworks.
S102.7	B Management objectives	Support	Support B1	There is a perception that forestry has been a significant contributor to sediment discharge. There is mention of "good management practices" under (b) on P278 (shouldn't this be sub-section (d)?) but I am not confident these have been well defined or monitored.
S102.8	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Amend	No new forestry on highest erosion land but another rotation of existing forestry considered on impacts	Where the land is already tracked and managed the impacts of another rotation might not be worse than some other options. Should be assessed on risks.
S102.9	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	Amend	Support permitted activity but "farm environment plan certifier" requirement may be onerous depending on how much effort they demand. As I oppose the woody vegetation requirement, a change in Schedule 36 requirement in (b) would be needed for me to support this clause (i.e. would oppose if Schedule 36 was not altered).	There is no definition in this plan of a "farm environment plan certifier" and it does not seem to be a commonly used NZ national role. I acknowledge there is a GW process at <a href="https://www.gw.govt.nz/environment/land-use/farm-plans/apply-to-become-certified-for-farm-planning/">https://www.gw.govt.nz/environment/land-use/farm-plans/apply-to-become-certified-for-farm-planning/</a> with a number of people certified. I get the impression this could be a costly exercise which may be excessive for the scale of operation in this area.

## Raw submission documents

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

Document name ↓	File	Description	Upload date
No data			