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To: Healthy Rivers
Subject: Submission

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SUBMISSION TO WAIKATO REGIONAL COUNCIL ON THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPA RIVER CATCHMENTS 8th March 2017 Submission to the Chief Executive, Waikato Regional Council
healthyivers@waikatoregion.govt.nz

I am concerned about declining freshwater quality and habitat in the Waikato region and as such I support the overall objectives and direction of the Healthy Rivers/Wai Ora Plan Change 1.

However, I am also concerned as to what is going to happen on the water side of the kilometres of riparian fencing proposed. Having contracted to WRC recently, to carry out property inspections of fencing and riparian plantings required as part of Clean Streams and Land Improvement Agreements, I am aware of the weed corridors that can be created in these 'retired' areas if not managed properly.

I've seen blackberry over head-height pushing fences over or enveloping them completely. I don't believe continual spraying with expensive herbicide, so close to our waterways, is a sustainable option long-term either - for the landowner or the waterway. Setbacks of one metre don't allow for native riparian plantings to achieve a self-sustaining status, where ongoing management would be minimal or not needed at all. Three metres would be the minimum setback, with five metres preferable.

The biodiversity gains and wildlife corridors created region-wide, through well designed native riparian plantings (while very hard work

initially) would be exponentially valuable to the region. I understand the need to keep water moving from a soil conservation perspective, but there are ways to design plantings to allow for this and to design wetland areas to slow water down in other areas where practical and necessary.

I also believe a freshwater ecosystem health approach needs to be more fully adopted, i.e. many water quality attributes are missing and in-stream concentrations are missing or set too high.

Therefore, I'm including the requests made by the Waikato Environment Centre in my submission below.

Waikato Environment Centre's Healthy Rivers Plan Change 1 Submission:

- 1) Precise freshwater objectives.
- 2) The following freshwater attributes: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index); periphyton; cyanobacteria; benthic cyanobacteria; Dissolved Inorganic Nitrogen (DIN) & total nitrogen in the tributaries / sub-catchments; total phosphorous in the tributaries / sub-catchments; temperature; pH; toxic heavy metals; barriers to fish migrations, and; water flows and levels.
- 3) Instream limits (and associated targets) for loads (N and P), sediment loads, e-coli, toxic contaminant loads (e.g. metals, organic compounds), micro-organisms and temperature.
- 4) Load thresholds in sub-catchments and catchments coming under resource use pressure.
- 5) A freshwater implementation and program of change plan which includes
 - a) a transparent approach to developing monitoring, compliance, and implementation systems
 - b) steps to ensure that effective and cost-efficient monitoring, compliance, and implementation capacity is in place at the time the regime is introduced
 - c) monitoring and reporting on and reviewing the implementation of the policy
 - d) transparent public information for freshwater discharges and takes
 - e) a council report every two years on progress towards meeting objectives, limits and targets
 - f) steps the council will take if the combined interventions are not sufficient.
- 6) Farm environment plans as a controlled activity.
- 7) Load allocation approaches that are equitable, promote efficient resource use, future proofed and promote sustainable management.

Allocation approaches should not reward current or historic poor practice (grandparenting).
- 8) The Land Use Capability (LUC) classification system. Load allocations (e.g. nitrogen) should be based on the LUC and land suitability.
- 9) Rules to prevent over fertilising, overstocking, overgrazing, over watering and over draining.

10) A polluter pays mechanism such as a pollution tax, similar to the carbon tax in that revenue from this tax should be used to both clean up the water bodies, e.g. restoration costs, and incentivise good land management practices.

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