

Woldwide One Limited – Summary of Submissions

Name of submitter / Organisation	Support / Neutral / Oppose application	Wish To Be Heard?	Summary of submission
Ministry of Education	Opposed	Yes	<ul style="list-style-type: none"> • Groundwater under the farm flows towards Heddon Bush school, approximately 2km away, potentially decreasing the quality of this drinking water supply, • Nearby bores shows that Nitrate/Nitrite levels are elevated close to or exceeding the Maximum Accepted Value of Nitrogen (Drinking Water Standard for New Zealand), and show no trend of decreasing, • Cumulative effects including other farms, and time for contaminants to migrate through groundwater is not considered in the application, • An increase in groundwater nitrate levels will make the school bore water unsafe to drink, which may happen as a result of the proposed activity. There is no reference in the application to additional monitoring that may be required, or additional treatment or sources of water that the school may require.
Niki Gladding	Opposed	Yes	<ul style="list-style-type: none"> • Concerned that the modelled effects on the environment (as stated in the application) are not a good predictor of the actual and potential effects (on soil and ground and surface waters), • Proposed storage capacity of the effluent/slurry pond may be inadequate and that the land may not have sufficient capacity to handle the increased effluent volumes and concentrations, • Climatic changes may not have been factored into the equations for calculating storage volumes and the capacity of the soil/plants to hold and uptake nutrients, • Would like the number of cows on farm to remain at current numbers and practices improved to reduce current losses, • Potential effects of the water abstraction on Bog Burn not adequately considered, • Concerned that proposed use of groundwater not efficient.
Dr Rye Senjen	Opposed	Yes	<ul style="list-style-type: none"> • Greater effects on groundwater quality likely to be very detrimental to and already fragile environment (i.e. three quarters of native freshwater fish are under threat), • Nitrate concentrations in groundwater are elevated in this area which poses a risk to human health (e.g. methaemoglobinaemia risk), • Concerned that risk of groundwater contamination with E.coli has not been adequately addressed, • Concern that the time taken by contaminants in soil and groundwater to emerge in surface water is not adequately considered in the application.

Fish & Game Council – Southland Region	Opposed	Yes	<ul style="list-style-type: none"> • Fish and Game is responsible for the management of sports fish and game birds within the Southland region, • The Waimatuku Stream, associated tributaries, and estuary are sensitive and have significant fish and game values. There are existing issues in surface water quality of Waimatuku Stream, and estuary. Fish & Game national angler use surveys (repeated every seven years) have recorded a significant decline in angler usage of the Waimatuku Stream since commencement in 1994 / 1995 in a pattern that is consistent with decline of the fishery, • Expresses caution over interpretation of the Overseer modelling as: modelling has not been peer reviewed, good effluent management practice assumed, nutrient losses beyond the root zone through deep drainage not considered. Important because of the cracking qualities of the soil, • Inadequate information on: proposed monitoring or auditing to ensure that leaching rates do not increase, wintering plan for 200 cows not being wintered in the barn, site specific effluent management in terms of the soils and Central Plains physiographic zone, • No consideration given to interim catchment limits, nor assessment of alternative land uses that may reduce nutrient leaching, • The application is contrary to: <ul style="list-style-type: none"> - The RMA (1991) (part 2, s.6 and s.7); - The objectives and policies of the NPS-FM (2014) (Policies A2, A3, A4, B5, B7, and C1); - The objectives and policies in the PSWLP (2016) (Objectives 1, 3, 6(a), 6(b), 7, 8(a), 14 and 18; Policy 5, 13, 15(1), 15(2), 15(3), 16(1)(b) and (2)(c)); - The objectives and policies of the RPS (2017) (Issues WQUAL .1 - .3, Objectives WQUAL. 1 and .2, Policies WQUAL. 1, .2, .5 and 12 and Method WQUAL .3; Objectives BIO .1 and .2 and Policy .4). • The application should be declined, unless conditions including monitoring of adverse effects of the activity on the environment for the duration of the consent, Good management is implemented, and an annual audit of modelled nutrient leaching and current state and trends of surface and groundwater quality at the site and at a catchment level is performed.
Maureen Fraser	Opposed	No	<ul style="list-style-type: none"> • Winter effluent dispersal should be suspended until nitrate levels subside, or should be transported off the property to avoid further contamination of groundwater with nitrates • Any groundwater take should be suspended until Canterbury has recovered, as algorithms used to calculate sustainable groundwater takes are flawed.
Public Health South, on behalf of Southern District Health Board	Neutral	Yes	<ul style="list-style-type: none"> • Requested application not be granted until completion of catchment limit setting, • Consideration not been given to domestic supplies in the vicinity, nor total nitrogen loading in the catchment, • Cumulative effects at Oreti Beach have not been addressed. Harmful Algal Blooms occur at Oreti, and the risk is already considered high elsewhere around the coast, • Concerned about waterborne disease risk, which may be linked to intensive land use and antibiotic resistance trends. Concerned about the risk of pathogens in ground water, with Southland currently reporting a disproportionately high rate of illness from drinking contaminated groundwater. Notes that cracking characteristics of these soils are similar to the soils in Havelock North, allowing contaminants to leach directly to groundwater, • Supports Farm Management Plan provided with the application, including the use of a hard stand for wintering and wet weather, cut and carry proposals, and not discharging effluent to cracked soil.