

## **Submission relating to :**

### **Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region (Plan Change 1)**

**Jo-Ann Margaret Whyte McCready**

[REDACTED]

[REDACTED]

[REDACTED]

**I do not stand to gain commercial advantage from my submissions**

**I wish to be heard in support of my submission.**

#### **In making my submission I would like to emphasise the following points:**

- 1) There has been insufficient time or consultation with community for landowners to fully consider the implications of the policies and rules proposed in Plan Change 1 before entering the formal submission process
- 2) The maps provided within the Plan Change document are difficult to decipher meaningfully at a property level making it difficult for landowners to determine how they might be affected
- 3) There has been a heavy reliance on modeling to inform the policies and rules rather than placing the emphasis on collecting reliable data and 'ground truthing' and then applying appropriate actions
- 4) There is inadequate information on clearly committed resourcing from Greater Wellington for implementation of the plan, leaving landowners unsure of what the plan means for them in terms of the costs to them, both financial and time.
- 5) The lack of information on support resourcing, including for monitoring the implementation of Plan Change 1,, means that its implementation is likely to be "patchy" - potentially penalising those engaging proactively and using good management practices while failing to identify or deal with those engaging in poor management practices unless there are very blatant breaches.
- 6) The overall emphasis within Plan Change 1 is on regulatory methods and "requirements" on landowners rather than incentives to engage in best practice. It would achieve better outcomes if it was weighted in accordance with Recommendations 58, 59, 60, 61 and 64 of Te Awarua-o-Porirua Whaitua Implementation Programme, focusing on resourcing positive supports, such as through Greater Wellington's Environmental Restoration and Catchment teams, and actions rather than on enforcements

#### **Submission Points:**

##### **1.Total Lack of Consultation**

**Decision sought:** Withdraw the Plan Change in total.

**Reasons:** I am deeply concerned that GWRC is choosing to push through the changes encapsulate in PC1 with virtually no consultation involving those most affected by it.

I only discovered the existence of this Plan Change by word of mouth circulating through a close-knit community.

I consider that based on a total lack of meaningful consultation this process should be withdrawn and an effective period of consultation should follow.

## **2. Section 32 report Part D - 1.7 Policy Evaluation**

**Decision sought:** GWRC should be obliged to produce a thorough cost-benefit exercise and be compelled to recognise that the ratepayers are not a limitless source of funds. They need to follow a clear concept of financial accountability.

**Reasons:** Not all costs have been economically quantified, and the environmental and cultural benefits have not been quantified through a specialist economic impact assessment. The value in doing such an assessment was determined to be very complex and of limited relevance for implementation of the mandatory requirements of the NPS-FM. This is because we consider, had the benefits been quantified (e.g., a financial value assigned to represent how much society is willing to 'pay' for clean water) **the benefits would likely not outweigh the significant costs** associated with improving the environment in the manner directed by the NPS-FM – particularly in the urban areas.

This, above all else, is totally irresponsible and unacceptable.

It says that because GWRC knew that any cost benefit assessment would show a negative position they did not bother to find out. So not only do they have no quantification for the benefits they equally do not know the costs. The fact that GWRC consider that they are obliged to undertake an exercise is not a valid reason to have no idea of the value or the cost of the exercise.

GWRC is stating that no matter what the cost, the ratepayers will pick up the bill.

**3. Rules relating to livestock** In regard to Rule WH28 – Livestock access to a small river –the only animals referenced are cattle, farmed deer and farmed pigs.

**Decision sought:** Confirm that the rules are exclusive to these animals.

**Reasons:** In the absence of any other stock being mentioned the conclusion reached is that all such other animals are exempt from all rules where only these 3 animals are referred to.

**4. Small farm registration** –In regard to Schedule 35 -The requirement is for small farms of more than 4 hectares and less than 20 hectares to be registered as at 30<sup>th</sup> October 2023

**Decision sought:** Delete this requirement.

**Reasons:** Land owners are required to furnish a complex range of data including average stocking rates. They are also required to calculate effective grazing areas, map the property boundaries and show waterbodies where stock exclusion is required under new rules and to show the location of fences relative to the waterbodies.

When questioned in the Zoom meeting the GWRC staffer stated that it was a simple form to fill in. They also arrogantly assumed that all landowners will have all of the requested information at their fingertips.

This response shows a total lack of understanding of what is involved and the nature of the difficulty. Filling in the form is the easy bit – there will be very few in the community who will have the level of expertise required to perform the complex mathematical calculations to collate the raft of data required. Nor will they possess the cartographical skills to produce accurate maps, especially given the undulating nature of the terrain.

Whilst GWRC maintain that it is a simple form to fill in, they themselves have not yet produced the systems necessary to record the information.

GWRC also require the landowner to perform calculations relating to Nitrogen emitting from the property. Another simple form and application that has not yet been developed.

It is arrogant in the extreme for GWRC to expect lay people to gather, calculate and record data when GWRC has not yet developed its own systems to receive the data.

At the Zoom meeting GWRC staffers stated that they were expecting landowners to approach these requirements and gather the data as a matter of trust. They stated that GWRC would not rigidly adhere to the letter of the regulation and that if you did not reach the standards laid down all you had to do was apply for a resource consent. A resource consent application takes time, costs money and is beyond the technical abilities of most individuals. There is no guarantee that it will be approved and if it is, it may contain onerous conditions.

## **5. Small Streams/Rivers**

Within the document there are a number of references to small rivers, less than 1 metre wide,

**Decision sought:** Clarify the definition upon which other regulations rely eg. Stock exclusion and fencing rules.

**Reasons:** There is nowhere within the documents that tell us what the minimum size is. It is unacceptable to have an open-ended definition for a minimum.

**6. Earthworks 9.3.5: Earthworks** – Earthworks is a permitted activity, provided the following conditions are met: (a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or (b) the earthworks are to implement an action in the farm environment plan for the farm, or (c) the area of earthworks does not exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and p 152 earthworks shall not occur between 1 st June and 30 th September in any year

**Decision sought:** amend/remove these conditions

**Reasons:** These appear to be arbitrary conditions with no factual basis. Size of earthworks bears no relation to property size and a weather window is irrelevant- bad weather can occur at any point in the year, as proved by the recent extreme weather on December 12<sup>th</sup> 2023.

## **7. Vegetation clearance on highest erosion risk land– permitted activity. 9.3.4:**

**Decision sought:** p148 Amend A definition of pest plants is required

**Reasons:** There are many different pest plants within the region. Some, such as Old Man's Beard, pose a threat to establishing native vegetation while others, such as gorse, are known to act as a nursery for revegetation with native species

**8. Rule P.R27: The use of land for farming activities – discretionary activity.**

**Decision sought:** Amend - a) and b) do not allow for an individual property scale response

**Reasons:** Where the monitoring site is not defined. It should be possible to demonstrate at a property level whether the concentration exceeds the target attribute state. If the property activities are not contributing to an increase then a change in land use should be permitted

**9. Rule P.R17: Vegetation clearance on highest erosion risk land** – controlled activity Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200 m<sup>2</sup> per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body, is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this rule.

**Decision sought:** *more than a total area of 200 m<sup>2</sup> per property in any consecutive 12-month period*  
Amend these conditions – they do not allow for an individual property scale response

**Reasons:** These appear to be arbitrary conditions with no factual basis.

**End of Submission**