

GWRC PC1 Submission -Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region (PC1)

1. Details of submitter: Name(s) and Address for service			
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I wish to be heard in support of my submission at a hearing:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

2. Disclosures:		
I could gain an advantage in trade competition through this submission:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<i>Only answer this question if you ticked 'yes' above:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
I am directly affected by an effect of the subject matter of the submission that:		
(a) adversely affects the environment; and		
(b) does not relate to trade competition or the effects of trade competition		
<small>Note: If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.</small>		
I confirm that I have permission to provide this information, and that I have read and understood the Privacy Statement:	Signature	Date

I am livestock farming on close to 20 Ha adjacent to the Pakuratahi River in Kaitoke, Upper Hutt. I support maintaining a high level of water quality and environmental attributes in river catchments and other water bodies. We already have many regulations/restrictions in place to protect water quality and the natural environment. I am concerned that some of the of the additional restrictions proposed by PC1 are arbitrary, blanket regulations that are unnecessary in some catchments in our region, would be unfairly applied, and/or restrict landowners from further developing the potential/productivity of their land. This is happening at a time when we have a new District Plan proposed which seeks to protect the use of our better land for productive purposes (Upper Hutt District Plan Change 50).

As a general approach, further restrictive regulations should not be applied to farm land unless water quality attributes (mainly levels of E.coli, N, P, and sediment) in a catchment have exceeded acceptable levels and this is attributable to farming. It seems disingenuous that the Mangaroa River is shown as representative of rural streams and rural mainsteam in Table 8.4, PC1, when a very high proportion of the course of this river lies in farmland with a high density of lifestyle blocks. By way of comparison, the Pakuratahi River lies mostly (~75%) in bush and forestry land, and the equivalent

data, if obtained, would be expected to be closer to that for the Whakatikei River (Table 8.4, PC1). The limited information provided for other catchments in the northern Hutt region indicates E. coli levels are Good to Excellent in the upper reaches of the Hutt River and in the Pakuratahi River (Table 8.3, PC1). Similarly, the Hutt River and all tributaries above and including the Pakuratahi River, have high macroinvertebrate community health (Schedule F1, PC1).

The regime proposed to address inorganic nitrogen (IN) levels in water (and by proxy other contaminants) is particularly problematic in terms of being excessively pre-emptive and inequitable in its application. It is also striking that not a single representative waterway in Table 8.4 is identified as having excessive IN levels and future action is to maintain the present levels. The proposal that pastoral farms of 4 to 20 Ha with winter stocking units greater than 12/Ha register their farms, undertake nitrogen discharge risk assessments annually, and must avoid any increase in rolling 3 year average of nitrogen discharge risk is an onerous blunt tool it is hoped will help maintain IN levels (and other contaminants) in waterways at present levels. This should not be imposed unless IN levels are shown to be approaching unacceptable levels over time. Even in this circumstance, additional investigation is needed to establish that farming is a substantial culprit, because other sources contribute substantially to IN in waterways (Report 32, Section 32 Report: Part D, 6.9).

Should GWRC nonetheless impose the proposed regime for 4 to 20 Ha pastoral farming units, the trapping of individual farms at levels of nitrogen discharge risk arbitrarily at the time of registration needs to be avoided. Some may be at atypically low levels of risk at that time for any number of reasons and will be held to that anomaly permanently depriving them of reasonable productivity and enjoyment of their land. Alternatively, some with excessive nitrogen discharge risk will be able to continue on unhindered. A more equitable method would be to set a maximum allowable nitrogen risk level and alter this up or down as necessary based on acceptable catchment IN levels being challenged.

Clearly the level of knowledge and detailed data is inadequate in this area and this needs to be addressed to enable good decision making rather than imposing arbitrary and onerous requirements and restrictions on rural communities.