

Submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region

Submitter No: 26

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Christine Stanley wishes to be heard with an oral submission.

Background

- We live on the North-Eastern shores of Pāuatahanui Inlet on Grays Road. Alan (87) was born here and Christine has lived here for 45 years.
- We lie within Porirua City Council boundaries.
- We have farmed together in this area for many decades and all the land we have had responsibility for has, for all of these years, been subjected to planting plans and wetland creation with the simple aim of filtering/treating all water before it left the farm and drained into the Pāuatahanui Inlet of Te Awarua-o-Porirua harbour.

We therefore clearly support the intent of Plan Change 1 in improving water quality and ecological health objectives within Te Awarua-o-Porirua harbour.

- To the best of our ability, we have read the documents associated with this plan change. However this was hampered by the maps provided being of insufficient quality to be able to zoom in and see what marks are on our property. Therefore it is difficult to understand exactly what applies to us. Better quality maps need to be provided. What we can see of the maps shows there is clearly a reliance on the use of satellite images and assumptions made especially regarding waterways in particular which bear no reality to what is actually on the land.
- It seems that somehow GWRC is going to accumulate some 750+ maps of areas and administer them to achieve the aims of the Plan change. The Section 32 Report :Part D says "Capacity within the farm consulting sector is known to be limited and likely to be *'stretched'*". This does not look like a sensible plan to achieve the desired outcomes.
- GWRC has not demonstrated any real ability to carry out monitoring or responses to pollution and it is difficult to see how this would be managed reasonably.
- GWRC has indicated that the delivery of PC1 would require an additional rates rise of 14%. Porirua City Council (PCC) is already looking at rates rises in the high teens. This is on top of recent rural rates which have seen a rise of 50% for many residents. Using ourselves as an example we now pay \$1,000 per month in rates to live in our

house. The expected PCC rates rise will be between 18-24%. An additional 14% is simply not doable, nor is it sensible in achieving the desired outcomes of PC1. Many rural residents are very keen in re-vegetating their land and doing riparian planting and wetland creation and take their water discharges seriously. Many of us use any discretionary income in continually planting and fencing. These projects have been seriously hampered by the increasing lack of any discretionary income. The costs of PC1 will likely achieve the opposite to what they propose - a further reduction in the ability of landowners to invest in water improvement. Better outcomes would be achieved by being less regulatory and encouraging and rewarding good land management.

- The proposed registration form for areas under 4 hectares will need to take account of those titles which are part of a larger rotational grazing or regenerative farm. At times they have high stock rates for 2-3 days and then no stock for weeks, and the nitrogen produced will accordingly vary. One cannot be specific on how rotational grazing is carried out. It depends on the time of the farming season, the shearing, the weather, stock shelter from prevailing storms. One cannot be this specific. Rotational grazing depends on monitoring grass growth, i.e. best practice, not hard and fast regulatory methods.
- We support the Porirua City Council's comments in their submission that "PC1 is in a pdf format of 348 pages with no hyperlinked definitions and with A4 maps in appendices. This will eventually be added to the Natural Resources Plan which is also in a similar pdf format and is over 700 pages. This approach is out of step with current technology and best practice where plans are presented in digital formats. All district plans in the region are in eplan format with interactive GIS maps. It is 2023, and we strongly request that Greater Wellington convert both the PC1 and NRP to eplan format as soon as practicable to enable plan users to efficiently find information. This will improve regulatory compliance and reduce costs through time savings for plan users."

We found it too difficult to fill in the online form and wish the following to be noted;

1. Amend Method M44: Supporting the health of rural waterbodies. We support this in principle but it lacks timeframes and methodology. It could enable a programme of engagement and education with small landowners (> 20 hectares) by a certain date.
2. Amend Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100. Amend to include "Mauri is restored and waters restored to a natural state where possible."
3. Amend P.O3 and table 9.1: The health and well-being of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet and the Onepoto arm and the coastal waters of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1. Amend (f) to include by 2060. There are significant challenges in terms of costs to upgrade the wastewater network to achieve this objective.
4. Amend 2.2: Earthworks. Amend to allow gardening, cultivation and fence maintenance, to avoid unintended interpretation

5. Delete P.P29: Winter shut down of earthworks. Not allowing earthworks between June and September does not allow for stabilisation and access track maintenance.
6. Delete 2.2: Impervious surfaces. There is no rule requiring rainwater reuse in PC1 or the NRP. These specifications requiring the direction of water from impervious surfaces into a rain tank permanently plumbed have not been included in the costing assessments in the s32 Evaluation.
7. Amend Policy P.P.3. Freshwater Action Plans role in the health and well-being of waterways. The wording should reflect a more collaborative method rather than a regulatory approach.
8. Amend Rule P.R16: Vegetation clearance on highest erosion risk land - permitted activity. A definition of pest plants is needed.
9. Oppose Rule P.R27: The use of land for farming activities - discretionary activity. This does not allow for individual property uses.
10. Amend Maps: Many of the maps cannot be zoomed in without pixelation. It is not possible to identify properties.
11. Amend Map 86. It is inconsistent with the Porirua District Plan.