

Submission relating to :

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

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I do not stand to gain commercial advantage from my submission.

I wish to be heard in support of my submission.

1. Total lack of consultation

As part of the Whitemans Valley rural community I am concerned that GWRC is choosing to push through the changes in PC1 with virtually no consultation with those that are affected by it most. There are in the region of 700 properties in the 4-20 ha, a relatively small number which could have been contacted directly.

The majority of people, ourselves included, have only discovered the existence of this plan change through word of mouth through the community.

Based on lack of consultation this process should be withdrawn and an effective consultation should be implemented.

2. Reduction in sediment discharges from farming activities

There is no data provided evidencing where sediment is originating, therefore assumptions are being made that this is coming from farming activities.

The majority of properties affected are not farms in the traditional sense and I doubt that there has been any data collected to really understand the activities taking place on what are largely lifestyle blocks rather than farms.

GWRC is making the assumption that all sediment in rivers is the result of human activity. There is a strong probability that human activity can contribute to the sediment load but it is important to take into account that a proportion arises from natural erosion processes. It is vital that GWRC has a complete picture of all factors within the catchments, both natural and man made rather than simply taking a punt

Further PC1 action should be deferred until relevant data is collected.

3. Rules relating to livestock

In regard to Rule WH28 – Livestock access to a small river – the community notes that the only animals referenced are cattle, farmed deer and farmed pigs. In the absence of any other stock being mentioned the community concludes that all such other animals are exempt from all rules where only these 3 animals are referred to.

Confirm that the rules are exclusive to these animals.

4. Small farm registration – farms of 4 hectares or more

As part of the registration process 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.

While this may seem to be a simple task of form filling it assumes that all landowners have the information readily available.

Suitable systems and support should be in place at GWRC to collate and assist the information required.

5. False assumption that contamination originates from farming activities.

Overall there is a totally insufficient level of data to identify the point of origination of any contamination. The concept appears to be to require registered farms to collect the data for GWRC and at no cost to them.

There are, however, indicators from primary contact sites along the Hutt River that paint a clear picture. These contact sites commence from south of Te Marua and move through Birchville, Maoribank, Poets Park, Silverstream Bridge and from there past Taita Gorge on to Melling and the Hutt river estuary

All readings in the Upper Hutt reaches are excellent. Those reaches are fed by the rural rivers of Akatarawa and Mangaroa. It is not until downstream of Taita Gorge that the readings decline rapidly in quality. This clearly establishes that whatever contamination is present in the lower reaches is not originating from the farming communities of Akatarawa and Mangaroa.

GWRC appears to be putting a disproportionate amount of effort in to trying to solve a problem that does not exist. The farming communities of Upper Hutt have rapidly evolved and with the move away from dairy farming any prior problem has removed itself from the spectrum.

GWRC needs to move away from attributing contamination problems to farming and re-focus on the more complex issues of urban sources.

6. Small Streams/Rivers

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

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.

Clarify the definition upon which other regulations rely eg. Stock exclusion and fencing rules.

7. Section 32 report – 6.9 Sources of nitrogen and other contaminants.

This part of the report sets about systematically demolishing any justification for focusing on the rural sector.

The report tells us that stocking rates are low, even for the classes of land grazed.

It also tells us that absolute stock numbers are low.

It tells us that the amount of nitrogen fertiliser used is very low and that some farms apply none.

It tells us that there is a low opportunity to reduce nitrogen discharges either by reducing stocking rates or by reducing the amount of fertiliser applied.

It tells us that On Site Wastewater systems can be a source of nitrogen losses BUT they have no data.

And – they tell us that Gorse fixes nitrogen and has been found to leach as much nitrogen as a dairy farm.

This part of the GWRC's own reporting clearly establishes that none of the measures aimed at the Mangaroa Valley and Akatarawa Valley farming community are justified. It shows that the proposed measures will achieve little at an unquantified cost.

GWRC should take notice of its own report and withdraw all those measures targeted at the Upper Hutt farming/lifestyle block community.