То	regionalplan@gw.govt.nz
Details of Submitter	
Name	Dr Patricia Laing, PhD (Anthropology and Education)
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Disclosures	I could NOT gain an advantage in trade competition through this submission  My Social Science background includes: Senior teaching and management positions at Victoria University of Wellington (1989 - 2000), Senior research and research management positions in government departments (1976 - 1988 and 2001 - 2018).  Concurrently, I was a member of Health Council Research Committees (1984 - 1999), and the Social Science Advisory Committee of the Royal Society (2001 - 2009).
	I wish to be heard in support of my submission at a hearing.
Signature	Toplang

## The following is the submission I wish to make on the Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Greater Wellington Te Pane Matua Taiao's Section 32 report, Evaluation of provisions for Proposed Change 1 to the Regional Policy Statement for the Wellington Region seeks an integrated management approach of the region's natural and built environment guided by Te Ao Māori which I wholeheartedly support.

However, the document overall is complicated, unworkable; and, will put unreasonable demands and high cost pressures on landowners. Furthermore, freshwater provisions have been extended beyond what they should be, serving to prevent important consultation to clarify what will happen on the ground. There are also matters of process, and gaps in the content, that undermine an integrated management approach, and that therefore desperately need to be addressed.

One matter of process relates to the NPS-IB and the national direction on Pricing Agricultural Emissions.

P39 para 183 states that "Plan Change 1 is an important opportunity to align the RPS with the imminent NPS-IB. While this is at exposure draft stage now (so not gazetted), the direction is clear and if the NPS-IB is gazetted later this year as intended by the government, Council can address any matters of misalignment through the Schedule 1 process."

I have been involved as a community representative providing advice to the Upper Hutt City Council on the draft NPS-IB and from my perspective as a landowner in this area I disagree with the statement that the direction of the NPS-IB is clear. The Greater Wellington Regional Council should respect the consultation process integral to participatory democracy and wait until the NPS-IB has been gazetted rather than preempting the results of the latest round of consultation. Similarly, implementing the national direction Te Tatai utu o nga Tukunga Ahuwhenua: Pricing Agricultural Emissions before it has been finalised (only released for consultation today) shows disrespect for the participatory democratic consultation process.

Another matter of process relates to apiculture in the region.

As a beekeeper, and current President of the Wellington Beekeepers' Association, I am dismayed by the complete lack of consultation with stakeholders in the apicultural industry This lack of input from an important farming industry thoroughly undermines any attempt at an integrated management approach. While Greater Wellington has consulted with a Farming Reference Group (p36 para 167 refers) there is no beekeeper or other apicultural stakeholder providing input to this group.

One gap in the content relates to apiculture.

The NPS-UD has implications for beekeeping. In the Upper Hutt City Council area the titles in some new developments limit the number of beehives that property owners can host. On the other hand, some commercial beekeepers have arrangements with UHCC to place high numbers of hives on Council land adjoining new developments which raises a question about whether this could be regarded as "boundary stacking". This is to say that landowners' usage rights relating to beekeeping need clarification.

The list of pests to be managed under Plan Change 1 does not include wasps that in some cases threaten the continuity of apicultural endeavours in the region.

While Change 1 (p60 Objective A) "protects and enhances mana whenua/tangata whenua values, in particular mahinga kai." This seems to be an isolated mention of the importance of ensuring food security in the region. This topic could easily be missed, but needs to be highlighted especially in relationship to NPS-UD, NPS-IB, and extreme weather as well as in mitigation relating to Climate Change. Pollinating bees are crucial to successful food security in the Wellington region, as is increasing appropriate farming opportunities to protect food security including beekeeping.

## In summary:

- an integrated management approach to the region's natural and built environment guided by Te Ao Maori is wholeheartedly supported
- the document is complicated, unworkable; and, will put unreasonable demands and high cost pressures on landowners

- freshwater provisions have been extended beyond what they should be, serving to prevent important consultation to clarify what will happen on the ground
- the Greater Wellington Regional Council should respect the consultation process integral to participatory democracy and wait until the NPS-IB has been gazetted rather than preempting the results of the latest round of consultation
- implementing the national direction, Te Tatai utu o nga Tukunga Ahuwhenua: Pricing Agricultural Emissions before it has been finalised shows disrespect for the participatory democratic consultation process
- there is a desperate need to rectify the lack of consultation with the apiculture industry and its omission from this document
- landowners' usage rights relating to beekeeping need clarification
- wasps need to be added to the list of pests managed by the Greater Wellington Regional Council
- increasing appropriate farming opportunities to protect food security including beekeeping needs attention.