

SUBMISSION TO: GREATER WELLINGTON REGIONAL COUNCIL

SUBMISSION ON: WELLINGTON REGION - NATURAL RESOURCES PLAN - PROPOSED PC 1

DATE DUE: 15 December 2023

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PHYSICAL ADDRESS:



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INTRODUCTION:

My submission addresses the Proposed Plan Change 1 (PC1) to the Natural Resources Plan for the Wellington Region as it relates to proposed limits on grazing stock numbers.

The proposed PC1 may require land owners of 4 ha plus to register as a farm and declare average stocking rates over the past 12 months, including stocking rates over the winter period – 1 June to 30 September. It then sets out a seemingly arbitrary winter stocking limit of 12 stock units per hectare of effective grazing area, and finally requires the land owner exceeding 12 su/ha to have a resource consent to continue to graze the land.

In addition, all of this is being implemented without consultation with land owners, and it is understood that it became law retrospectively from the effective date of the Plan Change (30 October 2023).

BACKGROUND:

My wife and I have been farming in the Mangaroa Valley for over 30 years and during this time operated a successful Miniature Horse Breeding Stud until around the turn of the century, and, since then have run a pedigree beef breeding business exporting genetics (semen and embryos) around the World. This included providing the genetics for the formation of the foundation White Galloway herds in both South Africa and Chile.

These farming ventures could not have been achieved on our property and nearby leased land, if we had been limited to 12 stock units per hectare. Typically for our operations we have been running stocking rates of 20-30 stock units per hectare, and with careful farming practices, have done so, with no adverse effects to the land, groundwater or adjacent waterways. My 43 years experience as a practicing hydrologist has given me a good understanding of the processes of the water cycle in play here, enabling support of these observations.

Our property is very flat, shedding runoff very slowly, and with only low level applications of liquid fish fertilizer, sediment runoff and leaching of nutrients has been kept to a minimum.

In stark contrast, the adverse effects of sediment runoff from local logging operation areas, coupled with excess deer and pig populations (overstocked – su/ha?) on nearby GWRC land, have been clearly visible on numerous occasions following periods of high rainfall.

ISSUES:

1 National Policy Statement - Highly Productive Land vs Freshwater Management

On one hand the Upper Hutt City Council (UHCC) in its Rural Review of its District Plan has sought to implement the guidelines in the **National Policy Statement on Highly Productive Land** by classifying most of the Mangaroa Valley floor as "Rural Productive Zone", and in recognising the highly fertile soils therein, is not allowing any subdivision of land on areas less than 20 ha;

And, on the other hand the Greater Wellington Regional Council (GWRC) in its implementation of the guidelines in the **National Policy Statement on Freshwater Management** is now restricting stocking levels of this same highly fertile, productive, flat land, to levels easily achieved on marginally productive land??

Clearly there are conflict and inconsistency issues here!

2 National Policy Statement Resilience

In addition it is understood that the newly elected Coalition Government has already signaled its intention to review and change these National Policy Statements to allow Local Territorial Authorities to make provisions in their respective plans **now** to ensure that adequate land is made available through infill and subdivisions to meet population increase projections out to 30 years.

RELIEF SOUGHT:

I am seeking the following relief:-

1 Farm Plan Area Threshold

Limit the area of land requiring the submission of a Farm Plan to areas greater than 20 ha in line with minimum farm subdivision limits set by the Upper Hutt City Council for land in its 'Rural Productive Zone'.

2 Grazing Stocking Rate Limit

Limit the stocking rate threshold for needing resource consent to 24 stock units per hectares of effective grazing areas on flat, fertile, productive land.

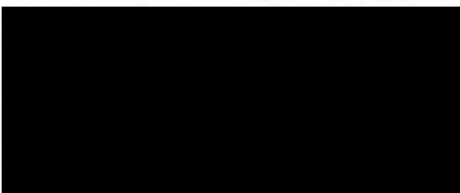
3 National Policy Statement Reviews

Await the results of the Government's National Policy Statement reviews before implementing any changes to GWRC & UHCC proposed Natural Resources Plan Change 1 & proposed Rural Review District Plan Change 50, respectively.

DECLARATION:

1. I declare that I do not stand to gain commercial advantage from my submission.
2. I wish to be heard in support of my submission.

Signed:

A large black rectangular redaction box covering the signature area.

R J (Bob) Curry

13 December 2023