

**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 submissions  
I wish to be heard in support of my submission.**

**My observations are shown in RED.**

**Requested relief is shown in GREEN**

**1.**

**Total Lack of Consultation**

The rural community, at large, is deeply concerned that GWRC is choosing to push through the changes encapsulate in PC1 with virtually no consultation involving those most affected by it.

The majority of the rural community only discovered the existence of this Plan Change by word-of-mouth circulating through a close-knit community.

**I consider that in the absence of any such meaningful consultation this process should be withdrawn and an effective period of consultation should follow.**

**Withdraw the Plan Change in total.**

## 2.

### Contempt of the rule of Law

The GWC has already experienced recent Environment Court judgements – GWRC v Adams & Others together with GWRC v UHCC – in which the presiding judge was highly critical of GWRC on a number of grounds including that GWRC were regulating by fiat. Once again GWRC appear to be indulging in this same practice.

Regulation by fiat is not acceptable and should be struck out.

Demonstrate respect for the rule of law.

Remove clauses that are demonstrably regulating by fiat.

## 3.

### Immediate effect of rules.

Section 32 reports clearly and unequivocally states under the heading “5.2.2 Legal effect of rules” that “**all of the rules in the proposed plan will have immediate legal effect** as they meet the requirements of section 86B.”

It is outrageous to “communicate” with landowners indicating they may already be in breach of a law they may or may not know anything about, in the absence of an on-farm inspection to determine their current situation. Further, it is not acceptable to make rules effective prior to their approval, nor is it acceptable, when approved, to make them retrospective.

Delete the statement that all rules have immediate legal effect and substitute “all rules in this plan change will be held in abeyance pending the plan change passing through all stages required by the RMA.

## 4.

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

The requirement is for small farms to be registered as at 30<sup>th</sup> October 2023. 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.

The expectation that lay people can gather, calculate and record complex data is totally unreasonable and therefore unacceptable.

Delete the requirement for farms of 4 ha to register with GWRC .

**End of submission.**