

From: Peter Thomson <peter.t@aop.co.nz>
Sent: Friday, December 15, 2023 10:39 AM
To: Regional Plan <regionalplan@gw.govt.nz>
Subject: Natural Resources Plan - PC1

Good Morning,

Please find attached my submission to the Natural Resources Plan.

Please note I have also endorsed a community submission made by Robert Anker of 76 Katherine Mansfield Drive, Upper Hutt. The content of this submission differs from the community submission and has points I wished to raise personally

Thank you

Peter Thomson

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Mob: [REDACTED]

Submission relating to :

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

Peter Byers Thomson

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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. Natural Resources Plan for the Wellington Region

The Natural Resources Plan is directly linked to the Regional Policy Statement (RPS) for the Wellington region as shown in the following extract from page 179 of the RPS

“Method FW.1: Freshwater Action Plans

*Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, as required by the NPS-FM to contribute to achieving the target attribute states **set in the NRP**, for each whaitua no later than December 2026. The freshwater action plans will outline non-regulatory measures, which, along with limits and other rules, will achieve target attribute states. Where an action plan is required by the NPS-FM it shall contain both regulatory and non-regulatory actions.”*

The recent issuance of proposed changes to the RPS show direct links to the National Policy Statement for Fresh Water Management (NPS FM) as shown in the extract below from page 2 of the RPS

“Proposed Change 1 to the Regional Policy Statement for the Wellington Region

The focus of RPS Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD), and to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM). RPS Change 1 also addresses issues related to climate change, indigenous biodiversity, and high natural character.”

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The Coalition agreement between the National Party and the NZ First Party for the incoming Government states on page 6 that the National Policy for Freshwater Management will be replaced. See extract below

“Replace the National Policy Statement for Freshwater Management 2020 and the National Environmental Standards for Freshwater to better reflect the interests of all water users..”

My Observations are:

- The proposed Natural Resources Plan for the Wellington Region has extensive changes primarily focused on Fresh Water Management
- These changes are largely drawn from, or a result of, the direction stated in the National Policy Statement for Freshwater Management
- The Government has committed to replacing the National Policy Statement for Freshwater management (NPS FM)
- It is inappropriate and a waste of ratepayers money to commit resources and expenditure to the implementation / adoption of the Natural Resources Plan for the Wellington Region when the Government has indicated that the NPS FM will be replaced

I Request:

The Proposed Change 1 to the Natural Resources Plan for the Wellington Region be withdrawn and not be reissued until the new National Policy Statement for Freshwater Management has been released.

2. Stocking Rate with respect to Amendments to Chapter 8 – Whaitua Te Whanganui-a-Tara

The term “Stocking Rate” is referred to in several places in the plan e.g:

- In the definitions where the Stocking Rate is defined as “The highest number of stock units per hectare carried on a farm at any time within a 12 month period”
- Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity
 - (a) pastoral land use where the winter stocking rate is greater than 12 stock units per effective hectare

It is important to understand the rural environment in Upper Hutt with respect to the catchment area for the City’s streams and rivers and the extent that stock may affect the quality of the freshwater.

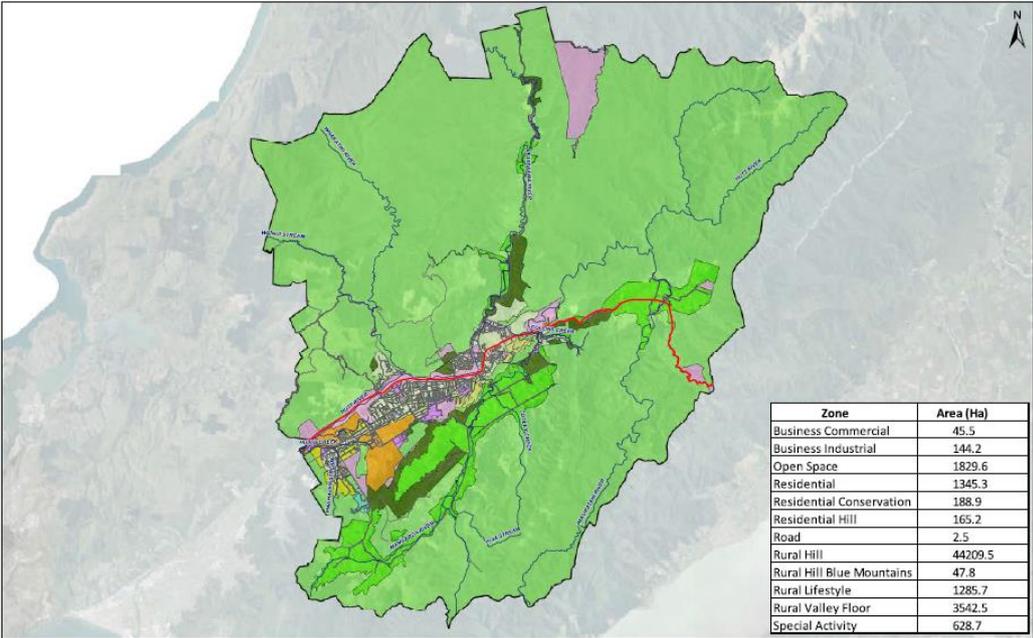
Upper Hutt City has a total area of approximately 54,000 hectares with rural land making up 96% of the total land resource in the District. Rural Upper Hutt is dominated visually and geographically by steep hill country that is covered in production forest or native vegetation.

The following is an extract from:

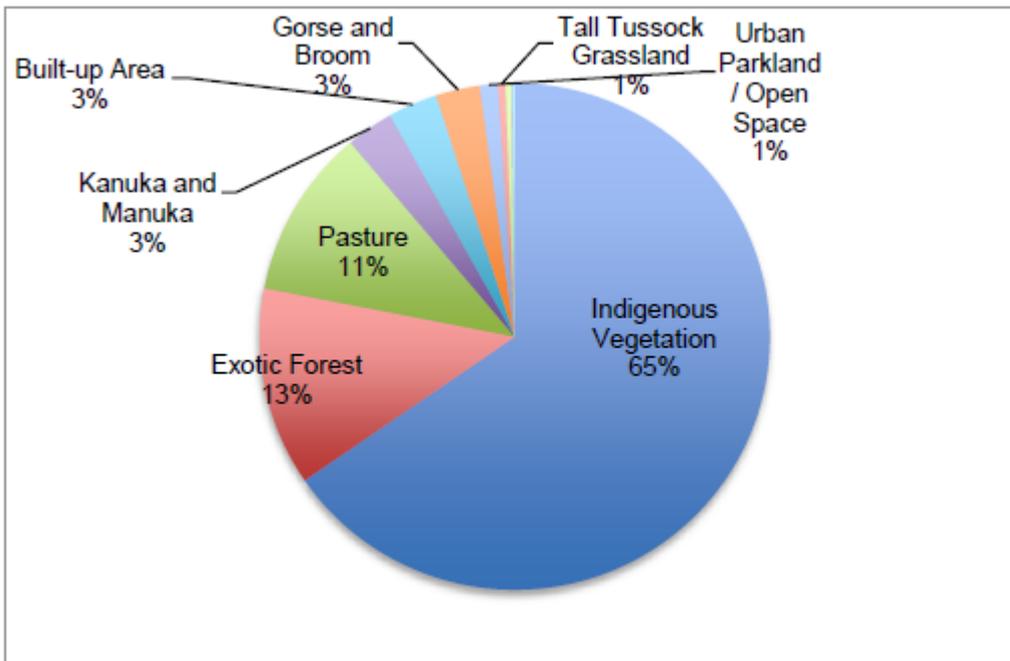
**UPPER HUTT RURAL STRATEGY
FOUNDATION REPORT – VOLUME I
Prepared for Upper Hutt City Council - October 2015**

The extract from pages 6, 7 & 8 of the above document provides context. Points of particular relevance are highlighted

WHAT DOES UPPER HUTT’S RURAL ENVIRONMENT LOOK LIKE?
Rural Upper Hutt is dominated visually and geographically by steep hill country that is covered in native vegetation. Graph 1 below shows the land cover ratios for Upper Hutt. **Indigenous vegetation makes up close to 70% of the District** and the vast majority of this is on the hill country. Some of this forest is (i.e. Kaitoke Rainforest) of high ecological significance and is not found in many other locations in the lower North Island. **Approximately 50,000 hectares of the rural environment is publically owned, mostly by Greater Wellington Regional Council (GWRC) and the Department of Conservation (DOC).**



Map 1: Upper Hutt District Plan Zones

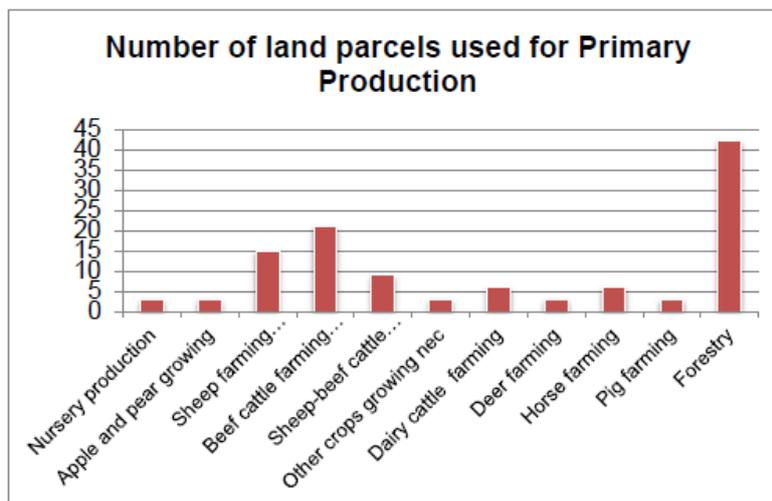


Graph 1: Land cover in Upper Hutt District 2012

The majority of privately owned land is on the valley floor and is mainly covered in pasture (which makes up 11% of the district's land cover). While there are no Class I soils there are areas of highly productive Class II soils and lesser productive Class III soils on the valley floors.

Graph 2 illustrates that there is a range of productive land uses in the rural environment with sheep and beef farming and forestry accounting for the most common uses.

The majority of the area of rural land in Upper Hutt is held in land parcels greater than 20ha. Most of this land is identified as being used for farming and forestry purposes. Graph 2 shows that 60 (20%) of the 288 parcels greater than 20ha are used for farming purposes. In contrast, land parcels smaller than 20ha make up the greatest number of parcels (1,700 Rural zoned land parcels are smaller than 20 ha), however only 45 of these (2.6%) have been identified as being used for farming purposes.



Graph 2: Land parcels used for Primary Production and type

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

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.

My Observations are:

- The vast majority of the rural landscape is native bush and Forest plantations
- The Greater Wellington Regional Council and the Department of Conservation own approximately 90% of the total Upper Hutt District therefore the vast majority of the water catchment area is in public ownership
- Pasture where some livestock farming occurs represents 11% of the total area and of the Upper Hutt District
 - a. only 20% of the 688 land parcels greater than 20ha are used for farming purposes
 - b. only 2.8% of the 1700 land parcels less than 20ha are used for farming purposes
- The Section 32 report (Section 6.9 Sources of nitrogen and other contaminants) notes that stocking rates are low, even for the classes of land grazed. It also tells us that absolute stock numbers are low.
- Wild animals, Deer and Wild Pigs specifically, are rampant in the region. I personally have culled close to 100 deer on my property in Kaitoke in the past 3 years. These animals roam freely in the GWRC and DOC land that surrounds my property
- I have counted herds of 40 deer or more come onto my land to graze grass
- I am in the process of erecting a deer proof boundary fence to keep the deer out
- I conclude that the number of animals likely to cause contamination of fresh water will be dominated by Wild deer and pigs on GRWC's own land
- I have observed that the GWRC do not have good practices for fresh water management on their own land. E.g. When 1080 is used to control possums, dead carcasses of possums and deer are left to decompose in waterways (animals seek water when poisoned with 1080).
- Livestock on privately owned land therefore, must be a small percentage of the total animal life in the district. I propose that the impact of livestock is not material in respect to the quality of the fresh water in the Upper Hutt District.

I Request:

The Proposed Change 1 to the Natural Resources Plan for the Wellington Region have stocking rates removed specifically for Amendments to Chapter 8 – Whaitua Te Whanganui-a-Tara as restricting or monitoring livestock numbers will have no material impact on freshwater quality in this district.

END OF SUBMISSION