

To: **Greater Wellington Regional Council**
Po Box 11646
Manners Street
Wellington 6142
By email: regionalplan@gw.govt.nz

Name of Submitter: **Willowbank Trustee Limited**

SUBMISSION ON PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN

1. This is a submission on Proposed Plan Change 1 (*PPC1*) to the Natural Resources Plan (*NRP*).
2. Willowbank Trustee Limited (*Willowbank*) could not gain an advantage in trade competition through this submission.
3. Willowbank wishes to be heard in support of its submission.
4. If others make a similar submission Willowbank will consider presenting a joint case with them at a hearing.

Background

5. Willowbank owns land in Porirua at 246B Paremata-Haywards Road, Judgeford, 115 Murphys Road, Judgeford, and 85 Murphys Road, Judgeford (*the Properties*). The extent of Willowbank's landholdings in the area is shown on Figure 1 below.
6. The Properties are known as the 'Willowbank Farm'. The land is used predominantly for farming activities.
7. Willowbank winters 200 head of sheep including replacements, 150 head of cattle including replacements, a horse stud of 20 horses, and a small herd of 38 alpacas.
8. The Properties have over 80 hectares of native bush areas, alongside over 2000 pole plantings for erosion control. Areas not planted on the Properties, identified in the Greater Wellington Regional Council (*Council*) maps as high/highest erosion areas have not been planted as there are no signs of these areas ever having had erosion. Also because of the climate and topography, plants and poles planted have not survived.

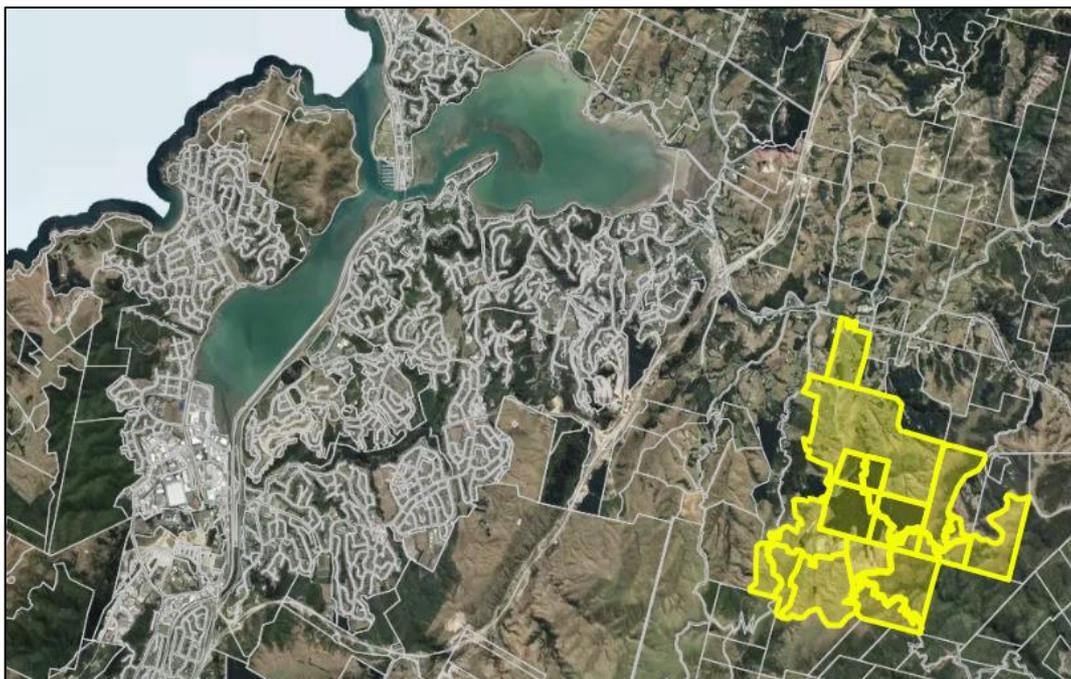


Figure 1: Extent of the properties owned by Willowbank in the Greater Wellington Region.

Submission

9. This submission generally supports the intent of the amendments to the NRP proposed by PPC1 given the importance of managing freshwater consistent with the National Policy Statement for Freshwater Management 2020. Willowbank recognises the importance of improving water quality, particularly in the Porirua catchment area. However, the greater Wellington area is, in large part, still held for rural and primary agriculture activities, and amendments to the NRP should acknowledge the importance of those ongoing activities to the region.
10. For that reason, Willowbank opposes parts of PPC1 on the basis that they do not:
 - (a) promote sustainable management of physical resources, including enabling people and communities (including the greater Wellington farming community), to provide for their health and safety, and their social, economic and cultural well-being;
 - (b) promote the efficient use and development of physical resources;
 - (c) ensure consistency with good resource management practise; or
 - (d) adequately manage adverse effects on the environment.
11. Without limiting the generality of the above, Willowbank:
 - (a) Supports parts of the NRP that enable the continued operation of farms in the greater Wellington region. Whilst farms in the Whaitua typically comprise smaller land-holdings by New Zealand farming standards, they contribute to the diversity, landscape and

amenity values, and economic productivity of Porirua and Wellington. Farming activities on sites of 20ha or more (Rule P.R.26) is supported as a permitted activity.

- (b) Submits that Policy P.P22(c)(i) be amended by deleting the words:

permanent woody vegetation cover of at least 50% of any erosion risk land (pasture) that is in pasture on a farm within 10 years, and ...

It is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Policy P.P22(c)(i) should focus on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions, rather than requiring a “one size fits all” approach.

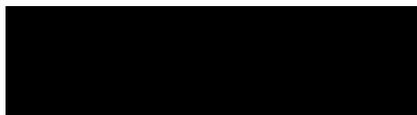
As a consequence, Willowbank also seeks:

- (i) Amendment to Policy P.P2(g) to either delete “with woody vegetation” or revising to include: “with woody vegetation where practicable to do so”.
 - (ii) Amendment to Policy P.P20.3 by including “where practicable” after “woody vegetation”.
 - (iii) Amendment to Schedule 33: C1(c)(v) by including “where practicable” after “woody vegetation”.
 - (iv) Amendment to Schedule 36: E.1 by incorporating a “reasonably practicable” element to the establishment of permanent woody vegetation.
- (c) Opposes the additional erosion control requirements for Farm Environment Plans (Schedule 36), specifically the requirement that highest risk erosion land be revegetated up to 50% by December 2033. There are a number of issues that result from this, including:
- (i) practicalities of identifying erosion areas that are not contiguous;
 - (ii) practicability of fencing off areas that are not high risk;
 - (iii) difficulties associated with establishing vegetation on identified land; and
 - (iv) whether the outcomes sought will be achieved by the “one rule solution” proposed by PPC1.
- (d) Submits that the words “and by the phasing out of any poor management practices” be deleted from Policy P.P21(c)(ii). The focus on good management practices is supported, but while “good management practice” is defined in the NRP, “poor management practice” is not. It is therefore unclear what is meant, or who will decide what

constitutes poor management practices, which introduces significant uncertainty for farm owners.

- (e) Supports Policy P.P20: Managing the diffuse discharges of nutrients and *Escherichia coli* from farming activities as a permitted activity. Willowbank is supportive of good management practices to minimise the diffuse discharges into waterways, reduce erosion and exclude stock from water bodies. However, Willowbank seeks clarification from Council as to how diffuse discharges will be measured at an individual property level.
 - (f) Opposes Rule P.R28: Change of rural land use for changes in land use that are over a cumulative total of 4ha. Farmers should not be prevented or discouraged from diversifying uses of their land in an uncertain economic climate. To enable greater flexibility, the cumulative total of land subject to change should be increased to 20ha and Willowbank seeks that the activity status for change of rural land use be 'restricted discretionary', as the environmental effects associated with this activity can be easily identified in the NRP. Willowbank seeks that Council's discretion be restricted to the discharge of nitrogen, phosphorous, sediment or *Escherichia coli* into waterways, consistent with Policy P.P24.
 - (g) Opposes the requirement in Schedule 36 that Farm Environment Plans be both certified and audited by an approved auditor given the significant cost this will impose on farmers.
12. Willowbank requests amendments to PPC1 to give effect to the concerns raised in this submission.

DATED this 15th day of December 2023



Francelle Lupis, Counsel for Willowbank Trustee Limited