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Please enter your details below	
* Submitter Name: Full name, or Name of Organisation / Company	Graeme Iain Shellard
Contact person for submission: (If different to above)	Graeme Shellard
Telephone no: (Not required)	Insert
* Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method	graeme.shellard@gmail.com
* I wish to be heard in support of my submission at a hearing	Yes
* I would consider presenting a joint case at the hearing with others who make a similar submission	Yes
* I could gain an advantage in trade competition through this submission	No
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B
In providing a submission to Greater Wellington, I agree to having read and understood the terms and procees outlined in this Information Statement	
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Please enter your feedback in the next worksheet " 2) Feedback on Provisions ". All of the provisions in the proposed change have been included so please place your comments in the corresponding cells. If you have questions on how to use this submission form please vist our Submitter User Help Guide or email one of our friendly team at regionalplan@gw.govt.nz	

Submission relating to :

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

Name: Graeme Iain Shellard, Sarah Elizabeth Shellard, Cameron Anthony Shellard, Finlay David Shellard

graeme.shellard@gmail.com

We do not stand to gain commercial advantage from our submission.

We wish to be heard in support of our submission.

My observations are shown in RED.

Requested relief is shown in GREEN

This is a household submission and both we and I are used throughout to refer to the household views

1.

Statistical information supporting the incoming regulation of farming of small blocks

During the presentation to landowners on 4 Dec 23 the statistical information supporting the incoming regulation of farming of small blocks was challenged in question 5. The question related to the overarching reason that small farms were being targeted by this change, and that there was little understanding of the actual impact of small farms. Question copied below for reference.

The logic applied by the Council is fundamentally flawed and demonstrates a bias. The logic is:

- 1 – small blocks occupy 11% of the pastoral land in these catchments
- 2 – Are generally comprised of better quality land (in general)
- 3 – and accordingly have higher stocking levels (on average)
- 4 – it is true that we do not have a good understanding of the proportion of overall catchment contaminant loads that originate from small blocks
- 5 – from the information available we can infer that on a per hectare basis, the contribution is likely to be higher than from the larger farms (on average) due to higher stocking levels (on average)

I consider that:

1 – there should be a representation of other land uses, and their expected contribution – including forestry and wildlife – on our catchment of Colletts Stream there are lots more wild deer, pigs, possums and potentially goats than farmed cattle, pigs and sheep.

3 – It is simply untrue that because lifestyle blocks have better pasture, they have higher stock levels per hectare. This is a key assumption that would not take a significant amount of effort to check but has not been. Lifestylers near me have significantly lower stock holdings than larger commercial farms, use less fertiliser, and many use the land for other large animals – there are many horses and alpacas. I do not understand how such a fundamental and basic item not to be checked, nor how some animals have no perceived or identified impact.

5 – The whole plan is targeting lifestyle blocks based on an inference, an unvalidated assumption and the exclusion of other causes of the problem

There is no information supporting the basic premise of this change and we will incur significant regretful spend.

Withdraw the plan in total, develop and implement improvements through community-based support / education instead supported by measurements and reporting

5. Gerard advised that there is no statistical information supporting the incoming regulation of farming of small blocks. The targeted problem here may be (and probably is) insignificant. Is the council confident that this new layer of regulation is a high priority v say urban Stormwater.

There is statistical information that small blocks contribute to the diffuse discharges from rural areas in the sense that we know that small blocks occupy 11% of the pastoral land in these catchments, are generally comprised of better quality land (in general) and accordingly have higher stocking rates (on average). This is described in the Section 32 report. It is true that we do not have a good understanding of the proportion of overall catchment contaminant loads that originate from small blocks but from the information available, we can infer that on a per hectare basis, the contribution is likely to be higher than from the larger farms (on average) due to higher stocking rates (on average).

2.

General Approach

This plan change attempts to change behaviour through legislation without any understanding of cost or impact. Without consideration of costs approach to enforcement cannot be committed to meaning the council will depend upon neighbours reporting their neighbours and thereby damaging communities. No serious attempt has been made with landowners to discuss and address the perceived issues.

I consider this a fundamentally flawed, expensive and unmanageable change which does not align with the direction of the government, and that the option to work with landowners was not explored effectively.

Withdraw the plan in total, develop and implement improvements through community-based support / education instead supported by measurements and reporting

3.

Section 8 – River Health Current and Target State

Tables 8.3 and 8.4 show the baseline data at various points in local rivers. There is no date range of collection, no commentary on influencing activities.

I consider that this renders the information flawed. There is no information relating to data collection relating to recent weather patterns or river flows, nor any ongoing major works (including deforestation / harvesting) all which will and impact on the water quality, meaning the information as presented is valueless.

Withdraw the plan in total, develop and implement improvements through community-based support / education instead supported by measurements and reporting.

4.

Reference to a 2nd tranche of Change to the Natural Resource Plan

In the upcoming plan change work programme reference is made to RPS Plan Change 2, but there are no details on it. A question was asked about plan change 3 in a meeting (4 Dec); however, this was rejected and there was no mention of plan change 2.

Public notification of second set of NRP plan changes and RPS Change 2

End of 2024

I consider that the content of planned change 2 could have a material impact on my response to Plan Change 1 and believe withholding of this information to be detrimental to my understanding of the council's overall plan, and therefore limits my ability to respond effectively. I am particularly nervous that when asked about a reference to it as change 3 – it was not highlighted that a plan change 2 did exist.

Plan 2 high level changes or topics to be shared, and plan change 1 consultation re completed to allow consideration of planned change 2 in response.

5.

5.4.5 Uses of beds of lakes and rivers

Removal of the permitted use of erosion protection structures

I consider this is unnecessarily limiting to prevent scouring increasing. There are many situations where planting is not appropriate. Gabions and concrete blocks are used throughout the Hutt and Mangaroa valley since in many situations they are appropriate.

Reinstate the use of erosion protection structures.

6.

Timing, Misdirection, Volume of Documentation and Plain English

This plan was released 30 Oct 23, with a change on 6 Dec 23, and submissions due 15 Dec 23, (less than 6 Weeks). The document was released as the country went through turmoil with the election, and the subsequent party negotiations. I did not see any advertising for this plan change, especially

highlighting the impact on me. It is currently not highlighted on the regional council's front page of the website, need to navigate several layers to find it.

I was made aware of the plan change following a casual conversation with a neighbour on 9 Dec 23. In the last week I have highlighted this change to several neighbours who were not aware of the impact on them. The document itself is 347 pages long, and is accompanied by separate map viewers, and a background information document Sch 32 which is 384 pages long and needs to be read alongside the existing Resource Management Plan – a further 708 pages long and no links identified as “Te Tikanga Taiao o Te Upoko o Te Ika a Maui Natural Resources Plan for the Wellington Region” or similar words on the landing page. These documents are not written in plain English, are difficult and cannot easily be viewed or digested by lay folks like me. There are additionally 614 pages of difficult to search documentation across 13 technical reports. Supporting documents in plain English are very light on the actual impact with comments such as:

“intended to be a simple and straightforward process”

“we expect landowners will have the required information at hand”

“GW does not intend for the to be an onerous or costly exercise”

“we do not expect any cost”

The website page also has 7 very basic questions and answers, and no access to supporting information or slide decks (which were distributed to a limited email group).

I consider that 6 weeks is a tight timeline to complete a sensible review of the approx. 1,400 pages of difficult to read documentation, and 600 pages of technical reports, plus access the map viewers, the associated minutes I have from one meeting have little real details, the slide deck is extra ordinally light, and the supporting document has no landowner perspective, the technical reports require challenge – however I do not have the means to complete this effectively. The advertising for this significant change should have been more significant. I believe that had the council been proud of this plan and happy to stand by it openly, then this would have progressed very differently. It should be incumbent on the council to be more sharing with a genuine drive to educate and discuss this type of change. This is the council's job – I am reviewing it in my spare time.

Current process should be stopped, the plan split into digestible sub plans with a focus on users. Discussions should be completed with the wider group to identify when support can best be provided, and legislation brought in only when education, understanding and discussion fail. We all want to improve our environment – we just need to consider the tools we use – legislation or education, collaboratively or combatively and when it comes to money – how do we most effectively spend it – certainly not having several hundred people reviewing over 1000 pages of difficult documentation and employing an army of regulators and paperwork.

7.

Cost

The cost of this work and the impact has not been effectively considered. This plan will incur additional costs from a number of activities including (noting I did not have time to fully consider this list and may adjust it before hearing – hence “including”):

This process

- Creating the change plan itself and the associated consultant reports
- Completion of the submissions
- Review and challenge of the submissions
- Implementation of regulations

- Completion of phase 2

Documentation (creation, support creating, reviewing, monitoring)

- Creation of riparian plans
- Farm plans including nitrogen loss, riparian plans, mapping, erosion risk treatment plans, grazing of high erosion plans
- Change of ownership costs

Additional activities

- Surveying all the small rivers
- Additional monitoring eg – incoming boundary and outgoing boundary for river
- Loss of land
- Loss of value
- Maintenance of now unusable land
- Additional physical measures

Enforcement and associated legal action

- Identification of failures to complete documentation
- Identification of failures to complete documentation accurately
- Physically ensure plans are appropriate
- Physically ensure plans are complied with
- Enforcement to follow up on complaints from public/neighbours
- Legal action for wherever enforcement fails

All these costs are either incurred by GWRC or the landowner, or both.

I consider these costs are extreme for the value gained and the source and value of funding required is not addressed. This is an example of full reliance on regulation rather than working with communities. The council has demonstrated the difficulty in enforcement measures when facing landowners with intent and means (Adams/GWRC). It is reasonably likely that there will be a split between landowners that comply and those that don't, and bringing the ones that don't will be difficult, take a long time, and may fail which will erode compliance amongst the community. There is a significant financial burden to set this up and operate it, the approach of forcing our landowners to comply, is abrasive, divisive, expensive and unlikely to succeed. I do not understand how we can propose a regulation change without understanding the costs.

Withdraw the plan in total, develop and implement improvements through community-based support / education instead, supported by measurements and reporting.
Run workshops with the wider impacted community to review the originally considered high level options including all costs and benefits, impacts and high-level risks.

End of submission.