BEFORE THE HEARING PANEL

**UNDER THE** Resource Management Act 1991 (**Act**)

**IN THE MATTER OF** Proposed Change 1 to the Wellington Regional Council’s Natural Resources Plan (**PC1**)

**BETWEEN WELLINGTON REGIONAL COUNCIL**

Local Authority

**AND WAIRARAPA FEDERATED FARMERS**

Submitter S193 to PC1

**INTRODUCTION**

# Wairarapa Federated Farmers (**WFF**) made a submission on Proposed Change 1 (**PC1**) to the Wellington Natural Resources Plan (**NRP**).

# The purpose of this Hearing Statement is to summarise Federated Farmers’ position in respect of matters under consideration in Hearing Stream 1 (**HS1**).

# It should be read alongside the WFF submission (Part One and Part Two).

# This statement addresses Over-arching matters including Issue 8 Costs and benefits, Issue 12 Robustness of Evidence, and Issue 14 Provisions not applicable to whaitua.

# **OVER-ARCHING MATTERS**

# The WFF submission acknowledged the work of the two whaitua committees over a number of years to develop the respective Whaitua implementation plans which served as the basis for developing PC1, and generally supported the intention of progressive improvements in waterbodies across the whaitua.

# Alongside that, WFF note that Council is proceeding with PC1 against the Government’s intention to substantially change or replace the NPS-FM. The council reporting officer (s42A, para 29) notes that in June 2024, Council determined that it would continue with the statutory process for PC1, on the basis that pausing PC1 would “prolong uncertainty”. WFF does not agree - to the contrary, proceeding is likely to prolong the uncertainties and increase the inefficiencies for Council, submitters and the wider community.

# WFF submission recorded concern that some of the PC1 proposals had the effect of over-turning provisions that had only recently been made operative after protracted mediation and recommended retaining specified operative provisions including to respect good faith mediation and efficient process.

# In respect of operative definitions, and the extent to which they could be replaced by National Planning Standard definitions, WFF agree with councils reporting officer (s42A, para 161) that “*the most practical way of implementing the National Planning Standards is through a whole plan review process*”. WFF will return to this point in topic specific hearings (including in relation to the definition of earthworks).

# In respect of operative objectives (and the extent to which they continue to apply to the two whaitua), WFF understand (s42A, Issue 14) that objectives will be addressed in the objectives hearing (HS2). However, the s42A report goes on to discuss Objective O2 (recommending it be retained – WFF agree) and Objective O6 (recommending it should not apply to the two whaitua). WFF does not agree with this recommendation and does not agree with the reason proposed, ie, that use of water is a matter which is not aligned with the NPS-FM.

# In respect of the quality of cost-benefit analysis, WFF agree with councils reporting officer (s42Apara 177) that the s32 report is “*predominantly qualitative in nature*” and that “*further economic analysis is required*”. WFF will return to this point in topic specific hearings.

# In respect of submissions (including from WFF) seeking deletion of provisions where there are insufficient monitoring sites and lack of ground-truthed data, WFF note the council reporting officer (s42A, para 237) references the NPS-FM clause 1.6 to the effect that local authorities should not delay making decisions solely because of uncertainty about the quality or quantity of information available. The officer omits to include reference to the direction in clause 1.6 to “*take all practicable steps to reduce uncertainty”:* WFF will return to this point in topic specific hearings

# **CONCLUSION**

# WFF holds over-arching concerns about the efficiency and robustness of the process being followed for PC1 and notes that these concerns are shared by other submitters. WFF will return to specific relief sought in topic specific hearing streams.