

## Submission on NRP Plan Change 1 – Terawhiti Station

Good morning commissioners. My name is Michael Grace. I am a director and shareholder of Terawhiti Farming Co Ltd, Te Kamaru Station Ltd, and Te Marama Ltd. All three properties are collectively known and farmed as Terawhiti Station. Terawhiti is the largest landholding in Wellington City and comprises approximately 4,800 hectares and makes up a significant portion of Wellington's rural west and south coast. I am here today speaking on behalf of my family's significant interest in this proposed Plan Change.

My family has been farming Terawhiti since the 1840s. We have had to face a lot of challenges over the years, and we believe that Plan Change 1 is the latest threat to the farm – and I don't say that lightly. We are not, however, opposed to improving the natural environment. Indeed we want to leave it in a better state than we inherited it for future generations. We have already retired over 1000ha to regenerating bush and have planted over 10,000 mostly native trees. Terawhiti Station was the foundational property from which the Capital Kiwi programme sprung and was able to flourish. We are voluntarily, and actively engaging in activities that are enhancing the environment.

### General comments:

1. Our view is that the consultation process before the notification of Plan change 1 was poor, and, as to be expected, PC1 in its original notified form was simply unworkable.
2. Significant time and money was invested in the Whaitua process. Yet when Plan Change 1 was originally notified virtually none of the rural whaitua recommendations were incorporated. A lot of time and angst could have been saved had those recommendations been incorporated into Plan Change 1 before being notified.
3. Our view is that there was a conspicuous lack of guidance (online or otherwise) from Greater Wellington when trying to navigate through the Plan Change documents. There have been so many changes that it has been very difficult to follow the latest version and confusing about what is being sought. It was only last week that I learnt that the low slope provisions now only apply to the Makara/Ohariu catchment, and not the Ministry for the Environment's region-wide low slope map. As I say, a very confusing process.
4. From the outset I want to make it clear that the station is not against targeted actions that will improve water quality – where it is proven to be poor.
5. Mr. Willis in his rebuttal evidence (point 80) suggests that PC1 aims to take a low-cost approach to managing contaminant loss risk from farms. If only that was reality. In actual fact the costed

certified farm plans will only be a small cost of the implementation and maintenance of these proposed rules. What is being ignored is the cost to other areas of the environment and the community. Fencing off waterways is a huge initial cost to the environment, and the landowners. The salt-laden Makara wind means this fencing has to be renewed every 15 – 25 years (cost). Regular flood damage will mean ongoing repairs at much shorter intervals (cost). Alternative water sources will need to be provided for grazing livestock on the remaining land (cost). It will also mean more stock reliance on water from smaller waterways – surely that's a perverse outcome. Less grazing area means less income for the farmers and in turn wider community. We already have a very low stocking rate, but as a consequence of both the reduction on effective grazing land and the costs incurred we may have to increase the rate in order to simply stand still – is this a positive consequence of the proposed changes? In time the flow on effects will ultimately mean less jobs and income for farm staff, truck drivers, meatworkers, shearers, etc. What we don't see from this policy is how the sector is going to be able to replace this lost income.

6. Mr. Willis in his rebuttal evidence (points 95-96) agrees with Dr. Greer's assessment that all properties upstream of the Makara/Ohariu monitoring site contribute to the water quality. Yet he does not recommend trying to actually find the source of the contaminants. Why – because its too expensive – for the council. Yet it is acceptable to lump the cost with farmers without understanding the sources of contaminants.
7. Regarding E.coli sources Mr. Willis (point 161) notes that Dr Greer disagrees with submitters who say the source of E.coli is unknown and Dr Greer's opinion is that large reductions in E.coli from livestock will be necessary throughout the entire catchment to achieve the E.coli TAS. Yet there is no evidence specifically that farmed cattle in particular is a significant source of E.coli. We know through the rural whaitua work that there are high concentrations of horses grazing in Ohariu Valley, yet horses do not have to be excluded from waterways under PC1. There are also a significant number of septic tanks situated in the valley floor. And what about avian E.coli sources? Well, we don't actually know what the sources are, yet a blanket, and costly, approach applies.
8. With regard to Mr. Willis' Large Blocks rebuttal section. Point 220. We take exception to the view that requiring a certified FEP is a 'light regulatory touch' by recent standards. For almost 180 years we have been farming within the rules. There is now a risk that cost conscious and practical solutions outlined within the FEP may not be accepted by the certifier. We would then require a Resource Consent to continue farming – this wouldn't be a light touch, this would be the proverbial banging over the head of the regulatory stick. While I don't want to sound

melodramatic there are very real risks and costs that we are now facing because of this plan change.

9. With regard to erosion risk mapping we support the deletion of the 'high erosion risk' map and the subsequent proposal to use the new *potential* erosion risk land map as guidance ONLY in the FEPs. The previous requirement to establish woody vegetation on the highest erosion prone land was completely unworkable, not ground-truthed, and would have been a further waste of money. We have already tried planting both natives and exotics in some erosion prone areas – between the soil types, pests and the salt wind nothing survived. Therefore we supported those proposed amendments.
10. Finally, with regard to stock exclusion, we support the deletion of the Small Stream Riparian Programme. We are also supportive that the stock exclusion provisions now only apply to the Makara and Ohariu catchments, and only to the areas identified as low slope land within the catchment. We also support the amended Schedule 36 Provision F (on page 325 of the full plan change document) which allows for an assessment within the FEP to identify where excluding stock from waterways would be impractical. That is an important change. We do however seek that the consideration of cost be included in clause F 2. Clause F 2 c) talks about the adverse effects of earthworks outweighing the benefits. Yet there is no mention of farm economic viability being an important consideration. To us that is of equal importance when we seek to achieve our triple bottom line goals of Profitability, Social and Environmental. Therefore we seek the inclusion of cost as being an equally important consideration when evaluating whether stock exclusion is practical or not.

Thank you for your time and we hope that you are willing to consider our concerns about how this plan change will impact us, and indeed the region.