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## **SUBMISSION ON “Plan Change 1 to the Natural Resources Plan”**

Submitter: David Gratton and Carolyn Thomas-Lewis Gratton

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Contact details for this submission are:

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### **Background on Our Submission**

My brother and I purchased the 200HA Black Bridge Farm in 1971, with the express purpose of planting trees on it, and following the Farm Forestry principle of grazing livestock on the better country and growing trees on the harder country.

We have large areas in Native vegetation as well, some of which is now under QEII covenant.

I have over 50 years of experience on this property of farming, planting, and harvesting trees. We are now in our 2<sup>nd</sup> rotation harvest and over that time have not experienced any land slippage or sedimentation extending to the Akatarawa River from our forestry practices.

The changes in harvesting procedures from our 1<sup>st</sup> harvest to today’s standards is significant. At all times, I have followed best forestry practices. My wife Carolyn is an Environmental Engineer and oversees my operation.

I run Wiltshire sheep on my flat paddocks adjacent to the Akatarawa River.

I endorse and support the submissions made by the New Zealand Farm Forestry Association and the Wellington Branch of the New Zealand Farm Forestry Association.

**1 The RMA and reasonable use of land:** Section 5 of the RMA requires resources need to be managed “in a way, or at a rate, which enables **people** and communities to provide for their social, **economic**, and cultural well-being and for their health and safety” and Section 85 of the RMA states that “any person having an interest in land to which any provision or proposed provision of a plan or proposed plan applies, and who considers that the provision or proposed provision would render that interest in land incapable of reasonable use, may challenge that provision or proposed provision on those grounds”. The proposed plan change will make it impossible for me to provide for my family’s economic well-being or to make reasonable use of my land.

- (i) Some of my forest is classified as being in the “highest risk” class, and I may not be able to replant and/or derive any revenue from the land post-harvest. I will still have the cost associated with maintaining the land, but without any income to offset these costs.
- (ii) Given that all forestry activities are now controlled, I may not be able to harvest my forest, due to the impossibility to meet the conditions listed in the rules.
- (iii) The cost of meeting the requirement may be prohibitive and, therefore the trees will be left to stand. Unattended forestry is likely to have a more detrimental effect on the environment than the harvesting of the forestry using best practice.
- (iv) Some of the river verges of my land is classified as high or highest erosion risk land (Pasture). What are the requirements for the adjacent flatland? Reduction in available grazing land would be detrimental for my sheep.

**2 The National Environmental Standards for Commercial Forestry (NES-CF)** have just come into effect. These standards were derived after considerable consultation with industry participants. The revised NES-CF has significantly tighter environmental controls than **The National Environmental Standards for Plantation Forestry (NES-PF)**. Time should be allowed to determine whether these controls achieve the outcomes desired before additional stricter regulations are imposed.

The NES-CF already requires that all forest (as permitted activities) have a full cycle plan, planting to harvest and replanting, to be available on request. Plan Change 1 requires an erosion control plan to be certified by a suitably qualified registered forestry consultant at an early stage and for the whole forestry cycle to be controlled and consented. Preparation and consenting of erosion plan early in the cycle for soil disturbance is unrealistic and unreasonable. Methods of harvesting have changed greatly over time and will continue to evolve as more and more technology comes into play. The cost to prepare and certify an erosion plan will not be economical for us.

We would request that all farm forestry blocks of 100 ha or less be allowed to follow normal NES-CF rules (permitted activities), and to be exempt from GW control activities. GW can still be notified of harvesting and/or soil disturbance near water bodies as routinely allowed for NES-CF.

The NES-CF has:

**erosion susceptibility classification** means the system that determines the risk of erosion on land across New Zealand based on environmental characteristics, including rock type and slope, and that -

- (a) classified lands in the following 4 categories of erosion susceptibility according to level of risk: low (green), moderate (yellow), high (orange), and very high (red);

and

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(b) is provided in the electronic tools referred to in item 1 of Scheduled 2  
(<https://www.mpi.govt.nz/forestry/national-environmental-standards-commercial-forestry/erosion/susceptibility-classification/>)

There are no orange or red soils in the Hutt Valley. I believe this classification should be used instead of what is outlined in Proposed Plan Change 1 for pasture, plantation forestry and woody vegetation. We do not agree with having to retire 10% of the highest erosion risk land as it is neither practical or economical for small forests or farms.

The mapping used in Proposed Plan Change 1 is not suitable for the management of forestry. The scale of 5 m x 5 m is impractical for the determination of “highest erosion prone land” as applied to forestry or pasture.

**3 Small Farms** of less than 10 ha should be exempted from the provisions of Proposed Plan Change 1. The cost of providing erosion management plans would be prohibited for a small farmer. If farm management (erosion) plans are required, they should be simple and the farmer should be able to provide the documentation without the need to hire as expensive consultant to do the documentation.

It is unclear what pastoral land of less than 20 ha is required to meet if only the steep river margins are deemed to be high/highest erosion risk (pasture). Our land has some steep river margins that are classified, but the remainder is flat grazing pasture. Do the rules apply to the entire paddock or just the verges? All the verges are already in woody vegetation.

Small Farm Registration. We do not support this added charge where there is no benefit to small holders. Any information the Council requires from small farm owners can be obtained from the rates data.

#### **4 Decision requested:**

1. All farm forestry blocks of 100 ha or less be allowed to follow normal NES-CF rules (permitted activities) and be exempted from regulations Proposed Plan Change 1 controlled activities.
2. All small farms of 10 ha or less be exempted from regulations requiring farm management/erosion risk management requirements to be prepared by farm consultants.
3. Until clarification of requirements imposed on land adjacent to high/highest risk land (pasture) is provided that the provisions in Proposed Plan Change 1 be deleted.
- 4 Small Farm Registration be deleted.

We wish to be heard.