

BEFORE THE HEARING PANEL

UNDER THE Resource Management Act 1991 (**Act**)
IN THE MATTER OF Proposed Change 1 to the Wellington Regional
Council's Regional Policy Statement (**PC1**)
BETWEEN **WELLINGTON REGIONAL COUNCIL**
Local Authority
AND **WAIRARAPA FEDERATED FARMERS**
Submitter 163 to PC1

HEARING STREAM SIX
HEARING STATEMENT OF ELIZABETH MCGRUDDY ON BEHALF OF
WAIRARAPA FEDERATED FARMERS

19 FEBRUARY 2024

INTRODUCTION

1. Wairarapa Federated Farmers (**WFF**) made a submission on Proposed Change 1 (**PC1**) to the Wellington Regional Policy Statement (**RPS**).
2. The purpose of this Hearing Statement is to summarise Federated Farmers' position in respect of matters under consideration in Hearing Stream 6 (**HS6**).
3. It should be read alongside the WFF submission, including submission points made at WFF 5.3 - 5.8, 8.17 - 8.18, 9.13 - 9.14, 10.7 - 10.8, 11.5, 11.12 - 11.13, 11.16 - 11.17, 12.3, 12.7 and 12.9.
4. It should also be read alongside the Statement of Evidence of Peter Match which addresses:
 - a) Objective 16, including consistency with RMA s6 and the NPS-IB
 - b) Policy 23 and 24, including timeframes
 - c) Suggested Policy 24A, including offsetting targets for 10% gain; and
 - d) Reliance on regulatory instruments to pursue restoration
5. This statement addresses the following matters:
 - (a) WFF Primary Relief
 - (b) WFF response to Council recommended amendments including:
 - Introduction
 - Objectives: 16, 16A, 16C
 - Policies: IE.2A, IE.3 and Policy 24A

FFNZ PRIMARY RELIEF

6. WFF relief sought generally that the scope of PC1 be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development; and specifically (WFF 5.1) that the proposed amendments to Chapter 3.6 be deleted and considered in the upcoming full review of the RPS, informed by the (then) upcoming NPS for Indigenous Biodiversity (NPS-IB).
7. WFF reiterate that this approach would provide a more measured, integrative and consultative process, including in the context that Council recognised that gazettal of the NPS-IB will have significant impacts “as it will necessitate changes to key policy direction and require substantive funding to implement its direction” (WFF 5.1).
8. Council’s reporting officers now propose incorporating some parts, but not other parts, of the NPS-IB; and amending various provisions to retrofit NPS-IB provisions into the notified provisions.
9. WFF does not agree that this is an effective and efficient approach. The various amendments proposed in rebuttal evidence are confusing for the ordinary reader; and it is difficult to distinguish which elements derive from the higher order documents, and the extent to which the provisions do or do not give effect to those higher order documents.
10. It is however clear that Council’s reporting officers are recommending that key elements of the NPS-IB not be incorporated in RPS PC1, including NPS-IB Objective 2.1 (1) (b) (iv) which provides for social, economic and cultural wellbeing.
11. Council acknowledge¹ that clause (iv) is not specifically referenced, suggesting that there are other objectives that relate to wellbeing, such as those in Chapter 3.3 relating to the benefits of regionally significant infrastructure. WFF does not agree that those other references substitute for inclusion of clause (iv).
12. The NPS-IB expands on clause (iv) in 3.5 “*social, economic and cultural wellbeing*”, including a direction that local authorities must consider (d) *the importance of forming partnerships in protecting, maintaining and restoring indigenous biodiversity*. This directive is consistent with WFF emphasis on partnerships for making progress; and is addressed in the evidence of Mr

¹ Appendix 3: assessment and recommendations on how RPS Change One should give effect to certain NPS-IB provisions

Match, including the need to work with stakeholders and landowners in order to encourage appropriate biodiversity management.

13. To the extent that the proposed amendments to Chapter 3.4 are progressed, WFF propose alternate relief on specific provisions below, including to give better effect to provisions in the NPS-IB which are not to the forefront in Council's reporting officer recommendations:

- Providing for the social, economic and cultural wellbeing of people and communities (NPS-IB 2.1)
- Providing for the importance of partnerships in protecting, maintaining and restoring indigenous biodiversity (NPS-IB 3.5)

INTRODUCTION

14. WFF's submission recommended (WFF 5.3) that the introduction should be updated in the upcoming full review of the RPS to include presentation and analysis of up to date regional data on state and trends in indigenous biodiversity.

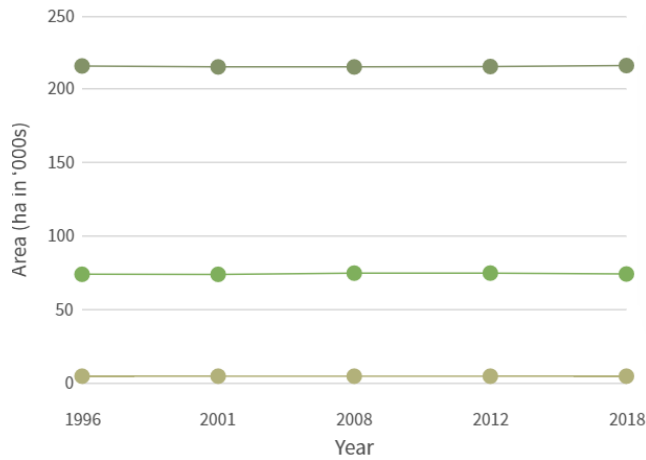
15. This recommendation is especially pertinent in light of NPS-IB Objective 2.1 to "*maintain indigenous biodiversity so that there is at least no overall loss in indigenous biodiversity*".

16. To the extent data is available to support an assessment of where this region is at against that NPS-IB objective, it should be included in the introduction, for example the following LAWA graph (WFF 5.3) which shows there has been no overall loss of indigenous landcover in this region over recent decades:

- top line is indigenous forest
- middle line is indigenous scrub/shrubland
- bottom line is tussock grassland

How has land cover changed over time?

Select land cover class(es) from the list below



OBJECTIVES

17. Council propose four objectives (16, 16A, 16B, 16C) which in part reflect higher order documents (RMA s6, NPS-IB) but only in part. As currently drafted, these objectives omit matters which are central in the NPS-IB.

18. **Objective 16:** WFF recommend the following amendments to the rebuttal recommendations so that it reads as follows or to similar effect:

Indigenous ecosystems and habitats with significant indigenous biodiversity values, ~~other and~~ significant habitats of indigenous fauna ~~and the ecosystem processes that support these ecosystems and habitats~~, are protected and where appropriate enhanced and restored ~~to a healthy function state in partnership with the community.~~

19. **Objective 16A:** WFF recommend the following amendments to the rebuttal recommendations so that it reads as follows or to similar effect:

The regions indigenous biodiversity is maintained, and where appropriate, enhanced and restored ~~to a healthy functioning state, improving its resilience to increasing environmental pressures, particularly climate change, so that there is at least no overall loss in indigenous biodiversity while providing for the social, economic and cultural wellbeing of people and communities.~~

20. **Objective 16C:** WFF recommend the following amendments to the rebuttal recommendations so that it reads as follows or to similar effect:

The importance of partnerships in protecting, maintaining and restoring indigenous biodiversity is recognised and provided for; and landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported.

POLICIES

21. Council's reporting officers propose amendments to various policies which in part reflect the NPS-IB, but only in part. WFF recommend amendments to give better effect to the NPS-IB.
22. **Policy IE.2A:** WFF recommend amendments to clauses as follows:
- a) clarify if the effects management hierarchy is intended to mean that set out in the NPS-IB (definitions)
- b) amend to add "while enabling established activities and providing for the social, economic and cultural wellbeing of people and communities"
- Explanation: amend to delete the line that reads "~~requires a more robust approach....~~"
23. **Policy IE.3:** WFF recommend clause a) be amended to read as follows or to similar effect:
- Identify the characteristics required for the regions indigenous ecosystems to be maintained or restored in a healthy functioning state including the processes that enable them to persist over the long term so that there is at least no overall loss in indigenous biodiversity while providing for social, economic and cultural wellbeing of people and communities.
24. WFF support the intent of clause b), ie, to identify strategic targets and priorities where the greatest gains can be made; and agree that restoration efforts be focussed to those priorities, including "significant" areas and "threatened" ecosystems. We agree with Council (WFF 8.17) that *"the best most ecologically intact sites are chosen for management because it is more cost-effective to maintain or enhance ecosystems with high ecological integrity than to restore degraded ecosystems"*.
25. **Policy 24A:** in the context that the NPSIB (and the proposed amendments to the RPS) direct that restoration efforts be prioritised to strategic areas including threatened and rare ecosystems, WFF reiterate (WFF 8.18) that

Councils proposals in respect of limiting offsets appear counter-intuitive and counter-productive.

26. As set out in the WFF submission, the effect of the Council proposals appears to be close to a blanket prohibition on offsets, or at the least, close to a strong directive that offsets should be confined to low value areas. WFF reiterate that – against the long list of “limitations” (Appendix 1A runs to nearly 20 pages) – WFF would find it helpful if Council were able to clarify (describe and/or map) those areas or ecosystem types with no limitations to offsets.
27. WFF record concern that the effect of the proposed limitations may be at odds with aspirations to increase “nature based solutions”: currently WFF is not clear where wetland or other types of NBS would be located (if all those ecosystems listed in Appendix 1A are out of bounds, or at the least with hurdles to surmount before proposing offsets in those areas).
28. WFF understand (Appendix 1A is not clear on this point) that Appendix 1A relies in part on a Council report estimating pre-human and present extent of forest ecosystems in the region ², before selecting certain of those forest ecosystems for inclusion in Appendix 1A.
29. That Council report includes assessment of “threatening processes”, reproduced below in respect of just two of those forest ecosystems (our emphasis):

Black Beech Forest (estimate nearly 50% remaining post human arrival)

Threatening Processes: Predominantly occurring in eastern dryland areas, there has been a large loss of this ecosystem type across the range as a result of Maori fires (Rogers et al. 1997; Perry et al. 2014). In the Wellington Region large areas remain in the Rimutaka, Aorangi Ranges, though forest loss has been extensive on the eastern Tararua foothills and Bracken Range (Beadle et. al 2004). Where ungulates are present understorey composition has generally been modified with the loss of many palatable species and a replacement by non-palatable species (Wardle 1967; Wardle 1984). **Black beech (like its close relative mountain beech) is palatable to both goats and deer and regeneration is locally retarded especially where ungulate populations have modified the understorey vegetation and little palatable vegetation is left. Locally this has eliminated the seedling bank and is resulting in canopy collapse as stands die (Hosking 1993)**

² GW/Escl, December 2018, Forest ecosystems of the Wellington Region

Kahikatea/Matai/Totara Forest (estimate <1% remaining post human arrival)

Threatening Processes: Major loss of this ecosystem occurred with Maori deforestation especially in Otago and Southland (Rogers et al. 1997; Perry et al. 2014). In the North Island only small remnants remain. In the Wellington Region it mainly occurs on the Kourarau Stream plateau, though small remnants are present in the southern Tararua District near Alfredton. All remnants are small, fragmented and many have been selectively logged.

Weeds are a significant threat and this ecosystem is highly vulnerable to invasion by a wide range of invasive weeds. Of greatest threat are species such as old man's beard which is capable of smothering forest canopies and reducing species diversity (Ogle et al. 2000)

30. WFF is not currently clear why these (and other ecosystems) which are threatened by invasive weeds and pests and which require active management to maintain their health and regeneration, should be proposed by Council as being (practically) ineligible for offsets.
31. WFF record here that Council intent in respect of offsets – and the formatting of Appendix 1A – is confusing for the ordinary reader. Pending any clarification:
 - WFF recommend that Policy 24A and Appendix 1A be deleted.
 - WFF recommend that Method IE.2 be amended to provide more broadly for development of a regional inventory of offsetting opportunities, which should include attention to the priorities identified in Policy IE.3.

CONCLUSION

32. WFF preferred relief seeks that the provisions under consideration in HS6 be deferred to the scheduled upcoming review of the RPS, including to give full effect to the NPS-IB in an integrated way.