

SUBMISSION ON
PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE
WELLINGTON REGION
GREATER WELLINGTON REGIONAL COUNCIL

To: Greater Wellington Regional Council
By email to: regionalplan@gw.govt.nz

Submission on: Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region

Name of Submitter: Urban Edge Planning Ltd
on behalf of Mangaroa Farms Ltd

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Attention: Karen Williams
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- This is a submission made on behalf of Mangaroa Farms Ltd concerning Proposed Plan Change 1 to the Natural Resources Plan as notified by Greater Wellington Regional Council on 30 October 2023.
- Mangaroa Farms Ltd could not gain an advantage in trade competition through this submission.
- Mangaroa Farms Ltd would like to be heard in support of this submission.
- Mangaroa Farms Ltd would not consider presenting a joint case with others that make a similar submission.
- Urban Edge Planning on behalf of Mangaroa Farms Ltd seeks confirmation that the planning framework relating to unplanned greenfield development does not relate to development in the rural environment, including within a Rural Lifestyle Zone, and that the activity status of WH.R22 is amended from prohibited to non-complying.

MANGAROA FARMS LTD BACKGROUND

This submission is made on behalf of Mangaroa Farms Ltd, who have land holdings in Mangaroa and Whitemans Valley. The Mangaroa Farms land holdings currently encompass some 20 properties with an overall area of approximately 875ha.

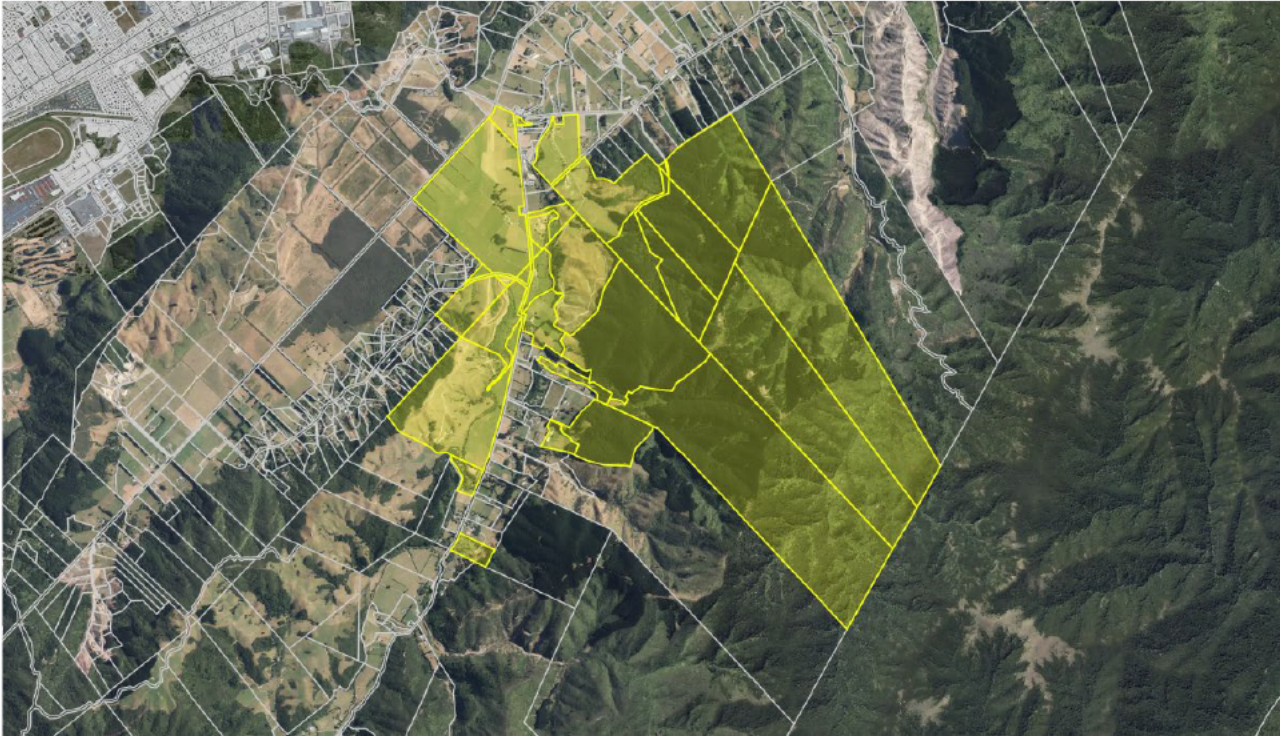


Figure 1: Mangaroa Farms Land Holdings as of 15 December 2023

Current Use and Development

The landholdings of Mangaroa Farms are currently used for a wide range of rural-based activities. These include but are not limited to:

- Organic crop growing (market gardens);
- Regenerative grazing (cattle, sheep and chicken);
- Farm shop;
- Volunteer days and workshops;
- Farm open days;
- Existing café that provides catering for internal seminars and events;
- Nursery to grow seedlings for restoration planting;
- Restoration and native forest planting to replace existing pine and plantation forests;
- River conservation and riparian planting projects;
- Rural residential / lifestyle blocks; and
- Plantation forestry.



Mangaroa Farms is the only working farm in the area that operates at a scale that is able to make a meaningful contribution to food production and supply for the local and wider community. Mangaroa Farms are dedicated to continue and increase the productive use of their land holdings and are striving to be a community food hub as well as a resilience education centre.

It is Mangaroa Farms ambition to become a living laboratory for the transitioning of traditional dairy farming and pine forestry into regenerative agriculture and native forests.

In this regard, in recent times Mangaroa Farms have significantly reversed previous land fragmentation and re-established sustainable farming practices and food production on their land holdings, with an ambitious regenerative planting programme also underway. The aspirations of Mangaroa Farms are not dissimilar to the overarching outcomes sought by Plan Change 1.

However, while productive and regenerative farming is at the core of Mangaroa Farms purpose and intentions, there is also a need to provide for the ancillary agri-rural and educational activities and associated development, including a desire to develop a rural Village Area to support the farming activities and the local rural community. Longer-term, there is also aspiration to accommodate a range of low-impact housing, such as clustered/hamlet and rural lifestyle housing on the land in a manner that is sensitive to the land and surrounds, which would occur alongside regenerative planting activities.

Mangaroa Farms is a registered nonprofit company.

PLANNING CONTEXT

Proposed Plan Change 1 to the Natural Resources Plan

On 30 October 2023 Greater Wellington Regional Council notified Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region (Plan Change 1).

The main focus of Plan Change 1 is the implementation of the National Policy Statement for Freshwater Management 2020 within the Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. To achieve this Plan Change 1 proposed the introduction of new objectives, policies, rules and other methods to achieve the appropriate management of freshwater and coastal water. The proposed provisions regulate earthworks, stormwater discharges, wastewater discharges and rural land use to improve water quality and ecological health.

Of particular relevance to this submission are the provisions of Chapter 8 – Whaitua Te Whanganui-a-Tara.

Within this context, it is noted that Mangaroa Farms is located in the Mangaroa catchment (Map 97) within Whaitua Te Whanganui-a-Tara. It is acknowledged that Plan Change 1 includes a range of provisions specific to farming and land use activities in the Mangaroa River catchment, in recognition that the baseline state for this waterway is below the national bottom line for visual clarity.

SUBMISSION

Overall Mangaroa Farms supports the direction and intent of Plan Change 1 to the Natural Resources Plan.

We acknowledge the obligation to give effect to the NPS-FM and recognise Council's proposal to protect and enhance freshwater and coastal waterbodies in the region through the proposed provisions. Indeed, the approach proposed within the Plan Change broadly aligns with the regenerative and sustainable farm practices undertaken and advocated by Mangaroa Farms Ltd.

There are, however, some areas within Plan Change 1 that Mangaroa Farms seeks to comment on, or clarify, where the impact of the Plan Change may constrain planned future activities within the farm.

Unplanned greenfield development

Mangaroa Farms notes with interest the proposed provisions that require the avoidance of all new stormwater discharges from *unplanned greenfield development* and the corresponding rule that makes any use of land and associated discharge of stormwater from impervious surfaces from *unplanned greenfield development* a prohibited activity.

Based on the proposed definition of "unplanned greenfield development" it is the understanding of Mangaroa Farms that the proposed framework in Plan Change 1 relates to greenfield development of an urban nature, and not to development that is provided for and could occur within the rural environment, including within a Rural Lifestyle zoning framework and corresponding Structure Plans. Mangaroa Farms Ltd have placed a submission on Upper Hutt City Council's Plan Change 50 – Rural Review (PC50), seeking the rezoning of a portion of the Mangaroa Farms land holdings to Rural Lifestyle Zone. Within their submission on PC50 to UHCC where the rezoning is sought, Mangaroa Farms also seek the introduction of a Mangaroa Farms Precinct and associated Structure Plan (included at Appendix 1).

Our understanding that the provisions relating to *unplanned greenfield development* do not apply to rural lifestyle and structure plan enabled development seems to align with and be supported by the corresponding s32 analysis, which notes that the proposed framework would only apply to a scenario that requires an underlying district plan zone change from non-urban zone to an urban zone to facilitate the greenfield development. A Rural Lifestyle Zone is understood to be a non-urban zone, and therefore, it is concluded that the framework relating to *unplanned greenfield development* would not be applicable to Mangaroa Farms intended future activities.

Conversely, if the proposed framework relating to *unplanned greenfield development* were to impact upon these plans, that would be of significant concern to Mangaroa Farms.

Based on the above, the particular provisions that this submission relates to are:

Chapter 2 Interpretation

2.2 DEFINITIONS: Unplanned greenfield development

Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development.

Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.

Feedback	Neutral
Reason for Feedback	The neutral stance taken by Mangaroa Farms is conditional on the proposed definition not applying to rural based development within a Rural Lifestyle Zone. Should this interpretation be incorrect, Mangaroa Farms would oppose the definition and related prohibited activity framework.
Decision sought	Ensure the definition of unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Chapter 8 Whaitua Te Whanganui-a-Tara

POLICY WH.P16: Stormwater discharges from new unplanned greenfield development

Avoid all new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.

Feedback	Neutral
Reason for Feedback	The neutral stance taken by Mangaroa Farms is conditional on the proposed provisions not applying to rural based development within a Rural Lifestyle Zone. Should this interpretation be incorrect, Mangaroa Farms would oppose the provisions and related prohibited activity framework.
Decision sought	Ensure the provisions relating to unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.



Chapter 8 Whaitua Te Whanganui-a-Tara

RULE WH.R13: Stormwater from new unplanned greenfield development – prohibited activity

The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity.

Note: Any unplanned greenfield development proposals will require a plan change to the relevant map (Map 86, 87, 88 or 89) to allow consideration of the suitability of the site and receiving catchment(s) for accommodating the water quality requirements of the National Policy Statement for Freshwater Management 2020, and the relevant freshwater and coastal water quality objectives of this Plan. Any plan change process should be considered concurrent with any associated change to the relevant district plan, to support integrated planning and assessment.

Feedback	Neutral
Reason for Feedback	The neutral stance taken by Mangaroa Farms is conditional on the proposed Rule WH.R13 not applying to rural based development within a Rural Lifestyle Zone. Should this interpretation be incorrect, Mangaroa Farms would oppose the prohibited activity rule framework.
Decision sought	Ensure the provisions relating to unplanned greenfield development does not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

Chapter 13 Maps

MAP 88: Unplanned Greenfield Areas – Upper Hutt City Council

Feedback	Neutral
Reason for Feedback	The neutral stance taken by Mangaroa Farms is conditional on the unplanned greenfield areas identified in Map 88 not applying to rural based development within a Rural Lifestyle Zone. Should this interpretation be incorrect, Mangaroa Farms would oppose the identified extent of unplanned greenfield areas.
Decision sought	Ensure the areas identified in Map 88 relating to unplanned greenfield development do not relate to development occurring in the rural environment, including the Rural Lifestyle Zone. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.



Rural Land Use and Earthworks

Mangaroa Farms acknowledge that PC1 includes a range of provisions specific to rural land use activities, including some that are specific to activities in the Mangaroa River catchment, in recognition that the baseline state for this waterway is below the national bottom line for visual clarity.

Further to this, it is noted that Mangaroa Farms landholdings contain small areas of land identified in PC1 as being *high risk erosion land* and *highest risk erosion land*.

The proposed framework in PC1 insofar as it relates to rural land use activities is broadly supported, noting that it generally aligns with the regenerative farming practices undertaken and supported by Mangaroa Farms. It is recognised that within this framework, there will be a need for Mangaroa Farms to prepare and comply with a *farm environment plan*, and ensure farming practices are undertaken in a manner that will minimise the discharge of nitrogen and sediment from the land.

In this regard, Mangaroa Farms takes a **neutral** stance on the following notified provisions, rules, maps and schedules in PC1.

Chapter 8 Whaitua Te Whanganui-a-Tara

Policies

- ***POLICY WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities***
- ***POLICY WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities***
- ***POLICY WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion***
- ***POLICY WH.P24: Phasing of farm environment plans***
- ***POLICY WH.P25: Managing rural land use change***
- ***POLICY WH.P26: Managing livestock access to small rivers***
- ***POLICY WH.P28: Achieving reductions in sediment discharges from plantation forestry***

Rules

- ***RULE WH.R17: Vegetation clearance on highest erosion risk land – permitted activity***
- ***RULE WH.R18: Vegetation clearance on highest erosion risk land – controlled activity***
- ***RULE WH.R19: Vegetation clearance – discretionary activity***
- ***RULE WH.R20: Plantation forestry – controlled activity***
- ***RULE WH.R21: Plantation forestry – discretionary activity***

Chapter 12 Schedules

- ***SCHEDULE 33: Vegetation Clearance Erosion and Sediment Management Plan***



<ul style="list-style-type: none"> • SCHEDULE 34: Plantation Forestry Erosion and Sediment Management Plan • SCHEDULE 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua 	
Feedback	Neutral
Reason for Feedback	In taking a neutral stance on these provisions, it is noted that any further restrictive changes to these could negatively impact the day-to-day operations of Mangaroa Farms Ltd, and accordingly Mangaroa Farms wish to remain involved in any process that could see these provisions altered.
Decision sought	Retention of notified provisions, or active involvement of Mangaroa Farms in relation to any changes that would result in a more restrictive framework in relation to rural land use activities and the associated works of Mangaroa Farms. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.

In addition to the above, Mangaroa Farms notes that Plan Change 1 proposes Rule WH.R22 which introduces a prohibited activity status for the afforestation, earthworks, or mechanical land preparation for plantation forestry on identified *highest erosion risk land (plantation forestry)*. Mangaroa Farms currently accommodates existing plantation forestry in this identified area (Map 95). Mangaroa Farms have the medium-long term intention to harvest the existing plantation forestry and undertake replanting of the slopes with native vegetation, in accordance with their regenerative farming practices. Notwithstanding this, to ensure future activities on Mangaroa Farms are not prohibitively fettered, the proposed prohibited activity status of Rule WH.R22 is **opposed** – as outlined below.

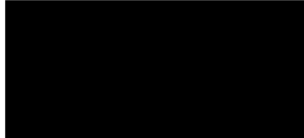
Chapter 8 Whaitua Te Whanganui-a-Tara	
RULE WH.R22: Plantation forestry on highest erosion risk land – prohibited activity	
Feedback	Oppose
Reason for Feedback	Mangaroa Farms recognise the need for restrictive controls on plantation forestry in areas identified as being at the highest risk of erosion. However, the proposed prohibited activity status is considered to be overly restrictive, and an alternative non-complying activity status is sought instead. This will ensure the activity continues to be restricted within areas where effects are anticipated to be the most significant, but will provide a pathway for such effects to be appropriately considered.
Decision sought	Amend activity status of WHR.22 from Prohibited to Non-Complying. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.



Conclusion - Decision Sought

Urban Edge planning on behalf of Mangaroa Farms Ltd seeks the following decisions from Greater Wellington Regional Council:

- Ensure the provisions relating to unplanned greenfield development do not relate to development occurring in the rural environment, including the Rural Lifestyle Zone.
- Amend activity status of WH.R22 from prohibited to non-complying.
- Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.



Karen Williams
Urban Edge Planning Ltd

On behalf of:
Mangaroa Farms Ltd

15 December 2023



Appendix 1 – Indicative Mangaroa Farms Precinct and Structure Plan

