

17 June 2022

The Proposed District Plan Hearings Panel  
Central Hawke's Bay District Council  
PO Box 127  
**WAIPAWA 4240**

**Attn: Jessie Williams**

Dear Jessie

### **SUBMISSION ON SUB-R7 – CONSERVATION LOTS**

Thank you to the Hearings Panel for hearing the submission from Nick and myself yesterday. We appreciated the excellent questions following our submission. The purpose of this correspondence is to briefly memorialise my verbal submission following the completion of Nicks formal submission.

I indicated that this year is my final year in practice. I have specialised in rural subdivision and conservation surveys since establishing The Surveying Company in Franklin District in 1989. The Surveying Company is also an accredited surveyor to the QEII Trust and we deal with conservation surveys on the east coast of the North Island. Over the last 18 years, we have been associated with the conservation of thousands of hectares of native bush, many of which are gully systems. This is important not only for wildlife, but very important for water quality.

It is with this background and personal passion for the benefits that conservation Lots provide that I added the verbal submission.

I have spoken with my former business partner in South Auckland to catch up with the current rules for conservation Lots in that District. My experience had been with the then Franklin County District Plan which became absorbed into the Auckland City plan with Local Authority Amalgamation. My former partner advises that the new conservation Lot rules were rigorously tested through the Environment Court and are now a very stable and well tested set of rules which I attach for your benefit. We have attached the Rural Subdivision Activity table along with the specific Auckland Unitary Plan rules for Significant Ecological Area and revegetation. As a starting point we refer you to A-16,17, 18, 20 and 22 in the activity table and then cross reference that to table E39.6.4.4.1.

Auckland City has comprehensively adopted transferable title rights that existed in the previous Franklin District Plan but have, according to my business partners, significantly improved those rules with better environmental outcomes. The general consensus is that Auckland City Council encourages the transferable title rights because the balance of the environmental benefit verses the impact of a rural subdivision is enhanced if the bush can be protected but the subdivision activity take place in an area that is better suited to rural lifestyle living.

We appreciate that this is a step too far for Central Hawkes Bay District Council at this stage but we consider this to be a direction which this Council could go. Our vision is that we could conserve all of the bush that is currently designated in the SNAs, particularly those areas of bush that are remote and difficult to fence. That then becomes the feeder source for rural subdivision nearer the townships on land that is not of high actual or potential benefit for agriculture and horticulture.

If we were to take a staged approach to this, we could achieve a start with in-situ subdivision and then over time develop that into the transferable title rights.

The Surveying Company is very happy to further assist the panel in considering these matters as we believe it is a win-win situation for Council and the environment.

Yours faithfully  
**THE SURVEYING COMPANY HB LTD**



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