

## Proposed District Plan submission form

Clause 6 of the First Schedule, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Remember  
submissions  
close on Friday  
6 August 2021  
at 5pm.

To: Central Hawke's Bay District Council			
1. Submitter details			
Full Name	Last <i>Coats, Abbott</i>	First <i>Ian, Sophie</i>	
Company/Organisation (if applicable)	<i>Waipuna NZ Ltd.</i>		
Contact Person (if different)			
Email Address	<i>iancoats80@gmail.com</i>		
Address	<i>664 Kairakau Road, RD4</i>		<i>Havelock North</i> Postcode <i>4295</i>
Phone	Mobile <i>0276661230</i>	Home	Work
2. This is a submission on the Proposed District Plan for Central Hawke's Bay			
3. <input type="checkbox"/> I could <input checked="" type="checkbox"/> I could not – gain an advantage in trade competition through this submission (Please tick relevant box)			
If you could gain an advantage in trade competition through this submission please complete point 4 below:			
4. <input type="checkbox"/> I am <input type="checkbox"/> I am not – <del>directly</del> affected by an effect of the subject matter of the submission that: <i>N/A</i>			
(a) adversely affects the environment, and (b) does not relate to trade competition or the effects of trade competition. (Please tick relevant box if applicable)			
Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.			
5. <input checked="" type="checkbox"/> I wish <input type="checkbox"/> I do not wish – to be heard in support of my submission in person (Please tick relevant box)			
6. <input checked="" type="checkbox"/> I will <input type="checkbox"/> I will not – consider presenting a joint case with other submitters, who make a similar submission, at a hearing. (Please tick relevant box)			
7. Do you wish to present your submission via Zoom? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
8. Please complete section below (insert additional boxes per provision you are submitting on)			
The specific provision of the plan that my submission relates to:			
<i>SNA Mapping</i>			
Do you: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose <input type="checkbox"/> Amend (Please tick relevant box)			
What decision are you seeking from Council? <i>Remove SNA mapping from district plan</i>			
Reasons:			
<i>Please see attached letter</i>			
Please note: All submissions will be treated as public documents and will be made available on Council's website. However, you may request that your contact details (but not your name) be withheld. If you want your contact details withheld, please let us know by ticking this box <input type="checkbox"/>			

6<sup>th</sup> August 2021

Central Hawke's Bay District Council  
28/32 Ruataniwha Street  
Waipawa

Proposed District Plan Submission:

We would like to submit a comment relating to the inclusion of Significant Natural Areas as shown on the Central Hawkes Bay District Council's Proposed District plan.

Firstly, we would like to state that we are supportive of protecting and cultivating the indigenous cover that remains on the plains and coastal areas of Central Hawke's Bay. We have a long-term vision to sustainably farm our land in a way that protects the existing native bush and the species that inhabit them and enables those blocks to continue regenerating. However, for the following reasons, we do not consent to the proposed SNA's situated on our private land.

The effect of limitations to land use proposed by imposing SNA's on landowners are unclear and will likely cause undue financial stress. Farmers are already feeling the mental and financial burden of new environmental policy that has been brought in recently. It is unethical to add yet another restriction on land that we were led to believe our family would have all rights to when it was purchased. Please do not punish us landowners that are making a huge effort toward taking care of our land in an environmentally ethical way. We are already doing our bit to preserve New Zealand's indigenous biodiversity, while maintaining our farming operation to supply Kiwis with high quality, sustainably farmed food.

1. One of our greatest concerns is that by classifying these privately owned areas as SNA's, you are taking away the freedom of choice and rights of us as the landowner. This has far reaching implications that would likely impinge on our livelihood and ability to continue with business as usual. We do not accept the council is entitled to control the rights of land that has been paid for privately, with no compensation and no certainty of how that could impact the running of the farm in the future.
2. While the permitted activities on SNA's are laid out in the District Plan, they are restrictive and will likely impact our business logistically and financially. Implications of this restriction could prevent us from carrying out plans we have already put in place that are aimed specifically at protecting native bush and bird species, while also creating opportunities to diversify our income. As the next generation to come into farming, we have seen in a short space of time that we need to diversify the way we run our business to adapt to this ever-changing agricultural climate. We are the next generation of farmers and have the best intentions in endeavouring to make positive changes in our farming practices, but these proposed SNA's are a huge roadblock in making those changes happen. Although the district plan states otherwise, it seems as though the current attitude toward landowners by

the Council does not take into consideration what is already being done to protect special areas, or what is being planned to continue that protection in the future.

3. We also take issue with the way these changes have come about. We have had no consultation from a council representative and feel as though we have been ambushed with the addition of these SNA's on our farm in the hopes that we roll over and accept them. We understand that submissions have been open for the proposed district plan since late May this year, but it was only because of concerns raised by Federated Farmers that we have become aware of what is being proposed and in turn done our due diligence on the matter. It is poor form that not one council representative has been in touch with us to discuss the matter, visited the farm to see in person these areas, or to hear how this would affect us as a family.
4. We understand that applications can be made to change the use of land, however it is unclear how tight restrictions will be on use of SNA's. The chances of allowing a proposed change of use to be permitted could be as low as none, which leaves us with huge uncertainty and therefore diminishes our rights to the land our family has purchased with the intent of developing over the course of our lives. These restrictions may affect our ability to make the changes we see as necessary to keep up with our financial obligations. In addition to this financial pressure, there is currently no compensation plan in place for landowners that are affected. If there was, it would at least help to mitigate the financial strain we will be placed under.

Many farmers have already succumbed to the financial pressure caused by increasing environmental policy and have cleared land to increase production or planted their land in pines blocks. Some have even had to sell. We would hate for more farmers to resort to these measures just to stay afloat but with the continuation of new environmental rules and regulations, it seems this could be a likely possibility in the future.

Aside from the ethical issues we see with this proposal, there are also several logistical issues that we see as being unclear.

- The boundaries of the SNAs outlined on the map that affect our farm, (SNA-234 and parts of SNA-276 and 279) are not absolute or clear. How is it possible to effectively gauge exactly and accurately where these bush blocks are on our property by sitting in an office looking at a computer. Many of these areas have tracks and fences running through and around them that are integral to ensuring the safety and wellbeing of our stock and farm workers. The mapping is ambiguous and does not take into consideration the landscape or existing infrastructure of the area.
- In section ECO-R3 1.b.iv. of the proposed District Plan it is stated that DoC, HBRC or CHBDC will undertake required pest control and removal of unwanted organisms within the SNA. We have concerns about the safety and accessibility of these areas for people who are not involved or familiar with current farm operations.
- Rights of access for council/ other involved parties are not laid out or clear. How are they to gain access to these areas if there is no existing track, or if the SNA is a long way from the road? If it was necessary to build tracks to allow upkeep of areas, who would pay for this work and would there be compensation to the landowner for

disruption to use of arable land? This opens a can of worms regarding rights of way and necessary pest control.

- Notes (1)&(2) of ECO-R3 indicate that the Council recommends that trimming or clearance must be carried out by an approved arborist with prescribed qualifications. This added restriction would place more financial strain on the landowner, many of whom live in remote areas with difficult access.

In conclusion, due to the considerable restriction, uncertainty, and lack of compensation, we cannot consent to the inclusion of SNA-234, SNA-276 and SNA-279 in the Central Hawkes Bay Proposed District Plan. We urge that you reconsider the inclusion of SNA mapping in the district plan and follow the direction of the Far North District Council in their decision to remove these maps from their district plan.

We wish to be heard on this submission.

Sincerely,

Ian Coats & Sophie Abbott  
Waipuna Station, Elsthorpe