

Proposed District Plan submission form



Clause 6 of the First Schedule, Resource Management Act 199.

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

To: Central Hawke's Bay District Council			
1. Submitter details			
Full Name	Last Coats	First Ouy + Ashley	
Company/Organisation (if applicable)	Waipuna NZ Ltd.		
Contact Person (if different)			
Email Address	waipunananz1td@gmail.com		
Address	664 Kairakeu Road, RD14, Hawkeck		North Postcode 4295
Phone	Mobile	Home 06 928 0990	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"/> 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 checked="" type="checkbox"/> I am not – directly affected by an effect of the subject matter of the submission that: N/A			
(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:			
SNA mapping			
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? Remove SNA mapping from Proposed District Plan			
Reasons:			
see attached letter			
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 August 2021

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

Proposed District Plan Submission

We wish to make a submission on the District Council's Proposed District Plan, specifically as to the Significant Natural Area (SNA) maps.

Although submissions have been open for this Proposed District Plan since 28 May, we were only made aware of the proposal on 19 July by Federated Farmers. We find it incredibly surprising that we received no direct notice of this from the Council since this proposal directly and significantly affects our family and our farm. We believe that consultation has been inadequate and we have not had sufficient time to prepare a comprehensive response to such an extensive and high-impact proposal. Nevertheless, we are making this submission in the hopes that the Council will reconsider the specifics of their plan and how it will affect its constituents.

We understand and wholeheartedly support the overarching goals of the Proposed District Plan, including sustainable management, kaitiakitanga, and ecosystem care. We love our land and its native flora and fauna and have been putting significant resources and care into our native forest areas for almost 20 years. As a family we view ourselves as stewards of our land and we take the responsibility seriously.

Some examples of the active stewardship we have engaged in over the years are:

- Native planting programmes;
- Erosion control by tree planting;
- Fencing off waterways and native areas;
- Sustainable grazing practices;
- Weed control;
- Pest control.

In addition, we have resisted the pressures that many farms have unfortunately had to give in to over the years to clear land for increased production or forestry purposes. We have not cleared native bush over the course of our history here specifically because we value it so highly.

It is therefore a blow to us that the Council now proposes to impose unworkable restrictions on us. We believe those restrictions are not fit for purpose, are needlessly heavy-handed, and will further increase our already skyrocketing compliance costs. It is incredibly ironic that had we cleared our native forests years ago, as some farms have done, we would not be subject to these restrictions at all. The Council's proposal will have the effect of punishing us for our protection of our native bush.

Besides these general objections to the Proposed District Plan, our specific objections include the following:

1. The Council's "desktop-based" survey of the region has not accurately mapped the areas of native bush on our property (namely, SNA 234 and parts of SNAs 276 and 279). It would be unfair to impose these proposed restrictions based on inaccurate maps which the Council has not even bothered to confirm by an in-person visit.
2. The current restrictions on activities in the SNAs have the effect of punishing those with larger and more complex SNAs, which we have. Large SNAs may require more access points and thus more activities such as track maintenance and pest control than a smaller SNA. This difference in SNA nature, character and needs does not appear to have been taken into account in the Proposed District Plan. Again, as we

have stated above, those who have taken the best care of their native forests would have to shoulder disproportionate and unfair compliance costs.

3. The SNAs identified on the Council maps contain areas with a mixture of meadow and forest. Our dreams for our property include the possibility of building off-grid cabins for our family or for limited eco-tourism opportunities. The rules are not clear whether we would be able to build in these meadows under the Proposed District Plan, which restricts our enjoyment of our land and our ability to diversify our income streams.
4. Our continued work in our native bush areas to build and maintain fences and undertake pest and weed control requires frequent track maintenance. We do not believe that the small allowance in the Proposed District Plan for clearing is sufficient for us to carry on this important work without the need for expensive and time-consuming resource consents.
5. There are several pine blocks on our land which were planted before our time. At places they are mixed in with the SNAs. Our plans to harvest these blocks to make way for native forests would be nearly impossible under the Proposed District Plan.
6. There is little to no clarity as to how these proposed rules would be enforced. What will the time and compliance costs be for landowners to assist the Council in monitoring the Proposed District Plan, particularly for large and remote properties such as ours?

Accordingly, we submit that you should remove the SNA mapping portion from the Proposed District Plan. We hope you will take our sincere objections into account along with the many others you will receive or have received from our neighbours in the community. The proposal has serious flaws and should not be implemented as it is; we have also received legal advice which confirms our views that the process has been deficient. We refer you also to the Far North District Council's recent decision to scrap these maps as a result of the overwhelmingly negative public feedback. We hope that any future plans with such wide-ranging effects involve much more consultation and with the community than this one has.

We wish to be heard on this submission.

Sincerely,

Guy & Ashley Coats
Farmers at Waipuna Station in Elsthorpe