
In the matter of: Proposed Waikato District Plan

And: Hill Country Farmers Group
 Submitter 482

And: Waikato District Council
 Local Authority

Summary of Presentation – Hearing 21A – Significant Natural Areas

INTRODUCTION

1. The Hill Country Farmers Group (HCFG) is a collective, proactive, advocacy and lobby group of 50 landowners/farmers. Collectively we are the stewards of 21,847ha within the Waerenga, Matahuru, Mangapiko and Whangape sub-catchments of North Waikato. We seek to provide practical and constructive feedback toward policy and regulation that affects our hill country farming landowners.
2. We would like to present an overview of the issues, practicalities, and implications of the Landscape topic from the perspective of hill country landowners, opening a conversation where the Hearing Panel can ask questions for clarity.
3. Each Hearing topic examines discreet aspects of the Proposed Plan Change, however it is on individual properties where these different rules intersect and their combined influence will affect landowners. We feel it is vital for the Hearing Panel to understand the practical implications of this policy mix, from people on the ground, who live and work on this land.

Definitions

4. HCFG feel the wording which describes Farming using ‘in-situ soil, water and air’ presents an unintended trigger which could require otherwise low intensity farms to obtain consent.
5. While low intensity farming relies mostly on the natural capital of the land while higher proportion of inputs are associated with Intensive Farming, there are situations that require flexibility and latitude to use supplementary input feed such as where multiple properties operate as a single farm system, harvesting silage on one property and feeding out on another, and in times of drought.

Mapping & Ground-truthing

6. There is general a consensus that the mapping exercise to identify SNAs has been less than accurate – producing both false-positives and false-negatives for qualifying areas.
7. The time and expense required to complete systematic robust verification of SNAs will be substantial to both landowners or Council.
8. Offering ground-truthing to only landowners who have raised submissions relating to the establishment of SNAs is inequitable and all landowners should be provided the same opportunity of certainty with verification.
9. HCFG agree with S42a report that SNA mapping must be ground-truthed before an SNA is identified on a planning map. Considering most SNAs exist in a stable equilibrium with current land use, we suggest most ground-truthing could be deferred until prompted by a change in status or land use.
10. We are also encouraged the S42a report indicates it is likely the Council will fund the investigation of SNAs.

Earthworks

11. We support the S42a report that importing fill is no threat to indigenous biodiversity and indeed necessary in some instances.
12. Conflict between recent versions of General Earthworks Rule 22.3.2.1 P1 & P2 exists in that earthworks for the purpose of creating a platform for a boundary fence must, by necessity, be on the boundary and not set back 1.5m as proposed.
13. Volume and area limits of earthworks for the purpose of constructing or maintaining tracks, fences or drains, measured over a 12 month interval is inappropriate.
14. The nature of fencing and tracking projects in hill country farms may be large yet happen infrequently. While fencing in hill country farms often requires earthmoving to create a stable platform, a new fence will stand for 50 years or more with little future disturbance.
15. We suggest earthworks allowances be calculated on a rolling average over 3-5 years.
16. Further to our presentation in Hearing 21b, we also suggest Earthworks allowances be proportional to the size of the property or, if applied more discretely, the size of the SNA.
17. SNAs occur for a number of reasons ranging from areas of intrinsically challenging productivity to landowners' own appreciation and protection of the bush. If these areas already exist in the context of current land use, we believe the General Earthworks Rules for the Rural Zone provides sufficient control and a specialised rule for SNAs is redundant.

Vegetation Clearance

18. We are concerned with the recommendation by S42a report that all manuka/kanuka (and other pervasive and persistent indigenous species such as totara) meet the criterion to be an SNA and so must be treated as such. The provision for removal of manuka/kanuka under 4m for the purpose of protecting productive pasture has been moved to 'within SNA's'.
19. Regardless of specific references to species and size, if S42a is suggesting that all areas automatically become SNAs as soon as indigenous species are present, the outcome will be the forfeit of all productive pasture where a native tree takes root. This will result in confusion, non-compliance, unjustified expense and unnecessary bureaucratic processing if consents are sought, or a gradual erosion of productive land area as we lose ground to the unrelenting entropy of nature.
20. Although S42a purports to support productive farming, moving the rule from outside to inside an SNA, leaves no permitted pathway or guidance on areas so-called 'outside SNA's', where most productive pasture exists.

Economic Impact

21. Environmental sustainability must be balanced against economic and social sustainability and only by supporting all 3 do we enable the synergy in which all 3 will thrive. Regulation to protect biodiversity should not impinge upon the economic viability of existing land use. Policy and rules need to enable a permitted pathway for activities which are usual and expected in the Rural Zone.
22. By far the most concerning aspect of having SNA designations on our properties is the potential for a shift in Policy direction, an escalation in Regulation, or future change in Rules or consent thresholds. Landowners need assurance that properties burdened with SNA are not liable or vulnerable to insidious policy creep.
23. Signalling from Council what this may mean for farming activities going forward will go a long way toward building confidence and providing some surety in the context of so many other shifting environmental targets and expectations.

Capital Land Value

24. Where a significant percentage of a property is designated as a SNA (or SAL) with map overlays literally painting landowners into a corner of their properties, activity restrictions and even the imposed stigma of Council covenants and impending resource consents will have a consequential impact on capital value.
25. As a very tangible example, one of our members' properties of approximately 100 acres of vacant land sits on an existing separate title and has been mapped as nearly 90% SNA. This property has been intermittently on the market, and while the owner contests the validity and extent of SNA, it has been rendered virtually unsaleable as buyers are daunted by the prospect of resource consents associated with site development.

Compensation

26. SNAs provide for protection of biodiversity, providing ecosystem services for an environment in which all humans participate and holistically benefit from. The good land stewardship which enables these areas to exist is not without cost to landowners. Yet we are rewarded for this by a repeal of confidence in our ability to continue to do so. At the very least Rates rebate pro-rata for land designated as SNA should be provided as acknowledgement when public good is the objective.
27. Further disadvantaging farmers who protect SNAs is the principle which disallows inclusion of integrated farm forestry or native trees in the ETS. The most obvious avenues with the potential to reward desired outcomes seem to be disregarded or invalidated.
28. All Conservation Lots, regardless of size, will require ongoing commitment and cost to landowners for maintenance and management. As such, all Compensation Lots should be eligible for some form of compensation.
29. If development Titles are offered, they should be proportional to the size of the SNA. We suggest where subdivision is not appropriate incentive, alternate compensation for Conservation Lots could be offered by way of Transferable titles.
30. HCFG believe the quality of SNAs is more important than the quantity. Particularly as every discrete protected area will consume valuable resources, both Council and landowner. If Council undertakes to have 'skin in the game' a more discerning selection process will improve the quality of SNA/Conservation Lots and provide a more robust and enduring outcome.

CONCLUSION

31. We ask the Hearing Panel & Council to encourage and support landowner efforts, rewarding those who volunteer to enhance SNAs, but don't use unnecessary restriction to handicap those who are quietly getting on with conservation in their own way.
32. The present character and value of hill country SNAs exist because they have been farmed in a similar way for over 100 years. Farmers already operate under the Council rules for the Rural Zone & a balance with nature has been largely already achieved. HCFG believe it is enough to recognise these areas as special without imposing specially constructed rules when these areas are likely to remain principally unchanged within this current equilibrium.