
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 21B - Landscapes

INTRODUCTION

1. Presenters will include:
 - Kirstie Hill, Secretary of Hill Country Farmers Group (HCFG)
 - Bruce Hill, Farmer & HCFG Committee member
2. 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.
3. 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.
4. 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.

PROCESS

5. The attributes of the hill country SALs appear generically & weakly defined. SALs are indicated to be a second tier landscape and while important, are less than outstanding. We believe the attributes that make them special exist in the context of current land use, and because farming landowners already support and protect those attributes. Farmers are custodians and caretakers of the land and the state of our farms and environment is a meaningful legacy we are proud of. The rules need to better enable customary practices for activities which are usual and expected within the Rural Zone.

6. Identification of Significant Amenity Landscapes appears extremely arbitrary considering the abrupt abandonment of Ridgeline and Landscape areas identified in the Operative Plan.
7. In examining the possible drivers for such a fickle swing in map overlays, HCFG can only speculate that capturing the DOC Hapuakohe Walkway and the Proposed Walkway/Cycleway/Bridleway which passes through the Taniwha Reserve has influenced the footprint of the Te Hoe SAL, although this has not been clearly articulated to affected landowners.
8. Landowners received minimum consultation regarding the identification process or the implications of SAL overlays on their properties.
9. The Waikato District Landscape Study, 2017 has placed a clear emphasis on the consultation process with the Iwi Reference Group. The attribute values are measured against a Maori narrative and world-view to the extent that IRG were given co-author credit for the report. Landowners were given no such consideration.
10. The WDLS acknowledged little or no ground-truthing was undertaken. The S42a Hearing 21B report indicates that ground-truthing could be made available to those who have submitted regarding SALs on their properties. HCFG believe this is a highly inequitable solution and a more systematic verification should be undertaken. Ground-truthing is required to provide justification and certainty around SALs.
11. Although HCFG will have specific comments about SNA's when the opportunity comes, in many ways SAL's throw a more ominous shadow. SNA's are discreet pockets of our farms, occurring for a number of reasons ranging from areas of already challenging productivity to landowners' own appreciation and protection of the bush. SAL's in contrast, cover large percentages of productive pasture, with map overlays literally painting landowners into a corner of their properties.
12. SALs are not static landscapes, though the policy and rules appear to seek they are preserved in stasis. While there may not be any explicit action required of landowners at present, there is a focus around what we can *no longer* do within SALs, which attempts to hold these areas in their current state in perpetuity. Farming requires flexibility and adaptability to stay viability. The SAL overlays will present real costs, both opportunity and real, to landowners.
13. We feel WDC has failed to present a practical roadmap for the direction of future management of SAL. Both the Waikato Regional Landscape Assessment, 2012 and the Waikato District Landscape Assessment, 2017 make recommendations for management of Landscape areas which range from maintaining visual character to preserving or enhancing biodiversity.
14. We have no indication and therefore no confidence around issues such as fencing/stock exclusion, pest control and public access, all of which present ongoing cost & liability to landowners. We seek assurance against insidious policy creep and clarification about the direction and timeframe of future regulation, landowner obligations and potential funding mechanisms. For example: Is it equitable for SALs to be treated as rateable land when it is effectively preserved for the public good and therefore limited in its productive value to the landowner?

RULES

15. Rule 22.2.3.4 Earthworks – within Landscapes and Natural Character Areas
We support the pragmatic view taken by S42a Hearing 21B – Landscapes with regard to unrestricted maintenance of existing farm infrastructure. These are already features of the landscape and therefore must be considered intrinsic to its current state and character. Allowing maintenance of this infrastructure not only satisfies health & safety requirements but ensures productive farm systems will continue to be supported.
16. We agree removing limits on volume and area for maintenance earthworks is necessary and would also suggest that new tracks, fences and drains be given similar consideration. There are already natural constraints upon the scale of earthworks for new projects such as cost, as well as the effect on productive pasture.
17. In response to S42a Hearing 21B point 250, HCFG also believe there will not be a “significant demand for new infrastructure”, and we suggest Rule 22.2.3.1 Earthworks General P1 & P2 are sufficient to guide the appropriate level of such work within SAL as for the rest of the Rural Zone.
18. In response to S42a Hearing 21B point 262, while Policy Planners and Council may consider testing customary activities for farming ‘just a resource consent’, we would like to emphasise what a significant and daunting barrier this will be for landowners. The practicalities, availability of contractors, costs and time challenges that farmers face in ‘getting a job done’ are considerable enough. It is beyond the capacity of many to navigate the bureaucracy involved in justifying what are otherwise appropriate and integral parts of productive farming businesses.
19. It will be exceedingly difficult for farmers to meet compliance of multiple layers of policy & rules that are clearly working toward unrelated targets, often unintentionally at odds with each other. For example: While stock exclusion requirements in hill country currently appear to have been minimised, there will still be considerable work undertaken to mitigate critical source areas in protection of waterways. Meeting fencing deadlines in the hill country will be hindered by a maximum annual allocation of earthworks.
20. HCFG believe there are practical reasons for increasing or removing area & volume limits on new work. For example: It is more economically sensible to bring contractors on to a property to complete an entire project/task – it is simply inefficient process to incrementally complete 250m of new track each year over 4 years, rather than 1000m in 1 event. Furthermore, we feel the visual impact of 1 larger disturbance event is preferable to scarring up the landscape a little bit every 12 months within the limits of the allocation.
21. While primarily focussed on ensuring workable permitted activities, HCFG support the S42 recommendation that the next tier of consent for earthworks within SAL be downgraded from Discretionary to Restricted Discretionary.
22. Rule 22.3.4.1 Height – Building General
HCFG seek to understand the intent and application of rules around buildings within a SAL. For example: Intensive Farming is restricted within a SAL, however glasshouse production is an exception to the definition of Intensive Farming and therefore allowed. WDLS states that “ridgelines are particularly sensitive to the

locations of structures, since their appearance on the skyline is often visually prominent from a variety of viewpoints.” HCFG believe that glasshouses do affect transient values during instances of sun-strike and glare and therefore question the intent and clarity of permitted activities and associated building rules within SALs.

23. An expansive landscape such as a Hill Country SAL is best appreciated from a distance. HCFG fail to see the purpose in restricting buildings to 7.5m within SALs. Viewed from a distance, the difference will appear negligible when compared to the general 10m building height in Rule 22.3.4.1 P1.

24. Rule 22.4.2 Title boundaries - natural hazard area, contaminated land, Significant Amenity Landscape, notable trees, intensive farming activities, aggregate extraction areas

HCFG oppose the restrictions on subdivision boundaries to avoid dividing a SAL. Boundaries must be determined by the practicalities of access and topography. SALs are already divided by exiting property boundaries. Having one owner or multiple owners of a SAL should make no difference.

DEFINITIONS

25. In examining the Permitted and Restricted Discretionary Activities in the Rural Zone and in the context of SAL overlays, HCFG feel the wording which describes Farming as ‘using in-situ soil, water & air’ presents an unintended trigger which would require otherwise low intensity farms to obtain consent.

26. We agree that low intensity farming relies *mostly* on the natural capital of the land while higher proportion of inputs are associated with Intensive Farming. However, there are situations which require flexibility and latitude to use supplementary input feed. For example: (1) Where multiple properties operate as a single farm system, harvesting silage on one property and feeding out on another property. (2) In times of drought relief.

27. HCFG seek to understand the rationale which differentiates permitted activities from those requiring consent within SAL. It appears that commercial forestry is a permitted activity, despite being identified as a threat to landscape values by the Waikato Regional Landscape Assessment, 2012 and the Waikato District Landscape Assessment, 2017. Preserving visual character and value is not upheld by allowing forestry as a permitted activity.

CONCLUSION

28. The present character and value of hill country SALs 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 do not believe we need a designation stamped on a map, or specially constructed rules to go with it, when these areas are likely to remain principally unchanged within this current equilibrium.