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Name	Charles and Andrea Lunam
Organisation	
Email	████████████████████
Response Date	Aug 30 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here

Waitaki District Council  
20 Thames Street  
Oamaru 9444



28 August 2022

Dear Fergus

**SUBMISSION - PROPOSED WAITAKI DISTRICT PLAN LAND ZONING CHANGES - ASSESSMENT 110083**

We write in opposition to the proposed District Plan land zoning changes. The proposed zoning changes are significant and have a fundamental impact on our existing land use rights, specifically farm productivity, farm values, and existing land use. They are restrictive, add cost and complexity provide no acknowledgment of landowner use rights nor provide the landowner any protections.

The proposed rezoning is based on subjective criteria. It provides no acknowledgement of any conservation work undertaken or planned to be undertaken and appears to penalise landowners who have made environmental protection enhancements and investments. Finally, it provides absolutely no protection for landowner rights into the future, since it appears future designation changes can be made without our knowledge and/or agreement.

What is the exact methodology that has been used to come up with the shapes on the maps supplied to us, there appears to be no logic or reasoning.

We also request that details of the GIS data for the entire district are provided to us.

While we support the need to, and in fact have invested in, protecting certain aspects of the environment, we **very strongly oppose** Waitaki District Councils proposed District Plan changes and the consequential impact of these on our land and land-use rights.

We wish to make the following observations and comments in support of our objection:

**1. Increase in the Significant Natural Area (SNA) and Outstanding Natural Feature (ONF) Zone:**

**Refer MAP A – Natural Environment**

The proposed Plan change significantly increases the area of our land designated as an SNA and ONF and, as a consequence restricts all future land-use as well as adding significant additional compliance costs to farm operations.

There has been no change to the land use or amenity value of our land since we have owned it, so we do not understand why there has been an assessment that suggests the area covered by "important biodiversity values" has increased. The assessments appear to be arbitrary, broad and subjective.

We have invested in developing our land and improving its productivity within the context of the current District Plan. We have enhanced our environmental protections as responsible landowners and farmers and have plans to keep improving our farming practices and returns. This appears to have worked against us. Indeed the more native bush and wetland areas on land the greater the compliance cost, use restrictions and cost burden imposed on the landowner. In fact, indigenous biodiversity becomes a liability.

The productivity of our land and therefore our income, will be negatively affected. For example, the proposed SNA and ONF extensions include farmland currently used for grazing stock. They have existing infrastructure such as boundary fences which regularly require maintenance and upgrades. There are also plans for new fences.

The requirement to apply for and gain a resource consent to add fences to our property or to improve productivity in any way, for example to introduce or increase irrigation coverage or other 'normal and responsible' farming practices, not only adds time but significant cost, stress, and uncertainty but removes existing land-use rights. These are rights we acquired when we paid for our property.

Further, as we understand the designation of an area as an SNA:

- Access must be provided by the landowner for the use of these areas. There are obvious operational and health and safety challenges with this on a working farm.
- There is no consideration of or protection for landowner privacy.
- There is also no future protection for the landowner as it appears the Council may change the rules without the landowner knowledge or agreement.

There has been no change to the land use or amenity value of our land since we have owned it. We have not been provided with the basis or justification for the extension of the SNA or ONF zones over our farm and as such strongly oppose the proposed changes.

At the very least, we request that the SNA and ONF boundaries are adjusted so that the boundaries do not encroach onto our private farmland:

1. the approximate edge of the Pleasant River estuary (Map A – indicated by black dashes); or
2. the existing current property boundary lines (Map A – indicated by silver dots)

There is an existing quarry which we wish to retain the use of for maintenance of existing farm tracks. We request that the proposed boundary of the ONF be shifted and this is excluded from the ONF area.

The SNA and ONF status should not encroach on our productive farmland.

## **2. The New Coastal Protection, Coastal Environment and Coastal Area of Degraded Natural Character Zones:**

### **Refer MAP B – Coastal Environment**

As landowners, we were surprised to see these zones being introduced as these zones were not mentioned in the original draft plan review.

We strongly object to the proposed Coastal Environment, Coastal Protection and Coastal Area of Degraded Natural Character zoning on our land.

The proposed zoning of our farm is subjective, not warranted nor justified. The farmland does not include any known natural and distinguishing features. It does not have any known particular unique character to be protected.

This private farmland does not complement or support the newly designated significant natural area (Pleasant River Estuary) and does not provide or enhance any visual amenity values of the District and therefore should not be zoned as such.

The reasons are outlined below.

The private farmland has been developed and cultivated over several years to include a dwelling, buildings, structures, yards, fences, lanes and cultivated paddocks which are used for intensive grazing. There are also power poles and wires running across the land.

There is no public or vehicular access to the Pleasant River Estuary which would allow views to the north of the private farmland proposed to be zoned in the Coastal Environment overlays. The land can only be viewed from private farmland and from private residences on the south side of the estuary. There is no public access or vehicular access to the adjacent Pacific Ocean.

When travelling on public roads in the district, the Pleasant River Estuary or the Pacific Ocean can barely be seen from Goodwood Road. There is only one vantage point at a moderately sharp corner where a glance of it can be seen.

When travelling on Goodwood Settlement Road, the views to the south only show a narrow view of a portion of the estuary at two particular points. You cannot get a visual of the full panorama of the estuary at any stage. You must look beyond the developed farmland with shelter belts, trees, fences and structures in the foreground to obtain a narrow visual of the estuary. Beyond the estuary, when looking south, development has already occurred, with several private residences able to be seen on the landscape.

Part of the proposed 'Coastal Protection' zone is within gullies of productive farmland not suitable for any type of development.

Part of the 'Coastal Area of Degraded Natural Character' proposed zoning is steep farmland not suitable to be used for any type of development. These are areas identified by us that would be suitable to undertake amenity planting.

At the very least, we request that the Coastal Environment boundaries are adjusted to:

1. the approximate edge of the Pleasant River estuary (Map B – indicated by red dashes); or
2. the existing current property boundary lines (Map B – indicated by black dashes)

We strongly oppose the proposed changes and request that the proposed zones below be removed from our land as they cannot be justified:

- Coastal Protection
- Coastal Environment and
- Coastal Area of Degraded Natural Character

At the very least, we request that the Coastal Area of degraded natural character boundaries are adjusted so that the boundaries do not encroach onto our private farmland:

1. the approximate edge of the Pleasant River estuary (Map B – indicated by red dashes); or
2. the existing current property boundary lines (Map B – indicated by black dashes)

### **3. The New Wahi Tupuna Zone:**

#### **Refer MAP C – Historical and Cultural**

The map showing the Wahi Tupuna zone on our private land, farmland used for stock and grazing is strongly opposed. The boundaries should not encroach onto private farmland.

Please provide substantive evidence of any history, whether written, oral and/or archaeological and/or evidence of any traditional activities that have occurred on our land that would justify this classification. Further please explain what “appropriately manage and protect” would mean for private farmland.

If there is to be a rezoning of this land, we will require formal discussions with a view to re-setting the land title and will be seeking compensation for having the land we bought and now farm confiscated. In the interim we seek to understand the basis of the reclassification.

At the very least, we request that the Sites and Areas of Significance to Maori District Plan draft boundaries are adjusted to:

1. the approximate edge of the Pleasant River estuary (Map C – indicated by red dashes); or
2. the existing current property boundary lines (Map C – indicated by silver dots)

#### 4. The Rural General Zone:

We strongly object to the proposed change in the Rural General Zone of a minimum lot sizes from 4 hectares to 20 hectares.

The change in minimum lot sizes is subjective, not warranted nor justified.

#### 5. Summary

We **strongly oppose** the Waitaki District Councils proposed re zoning of our land on the basis that:

- the assessment upon which it is based is subjective and without justification
- there has been no land use or land amenity change
- it imposes significant compliance cost
- it looks to restrict use, reduce farm productivity & reduce income potential
- it provides no protection to the landowner now and less into the future
- it penalises those who have invested in environmental and biodiversity improvements

We **strongly oppose** the proposed change in minimum lot sizes in the Rural General zone from 4 hectares to 20 hectares.

We wish to appear in support of our submission.

Yours sincerely

Charles & Andrea Lunam  
18 Goodwood Settlement Road  
RD1  
Palmerston  
Otago 9481











# Map A

## Map Content

### Layers

- Property, Planning Profiles and Have Your Say
- Settlement and Roads
- District Plan Draft - Precincts
- District Plan Draft - Historical and Cultural Value
- District Plan Draft - Coastal Environment
- District Plan Draft - General District Wide Matter
- District Plan Draft - Natural Hazards
- District Plan Draft - Natural Environment Values

-  Skink Management Area
-  Significant Natural Area
-  Significant Natural Feature
-  Outstanding Natural Feature
-  Rural Scenic Landscape
-  Outstanding Natural Landscape
- District Plan Draft - Infrastructure
- District Plan Draft - Hydro Electricity
- District Plan Draft - Zones
- ECAN Aerial Imagery 2021 (colours may vary)
- Aerial Imagery
- LINZ Topo50 Maps
- LINZ Topo250 Maps
- Base Map



Existing legal boundary

--- Approximate edge of Pleasant River Estuary  
 ... Existing current property boundary lines
















Search geographic names

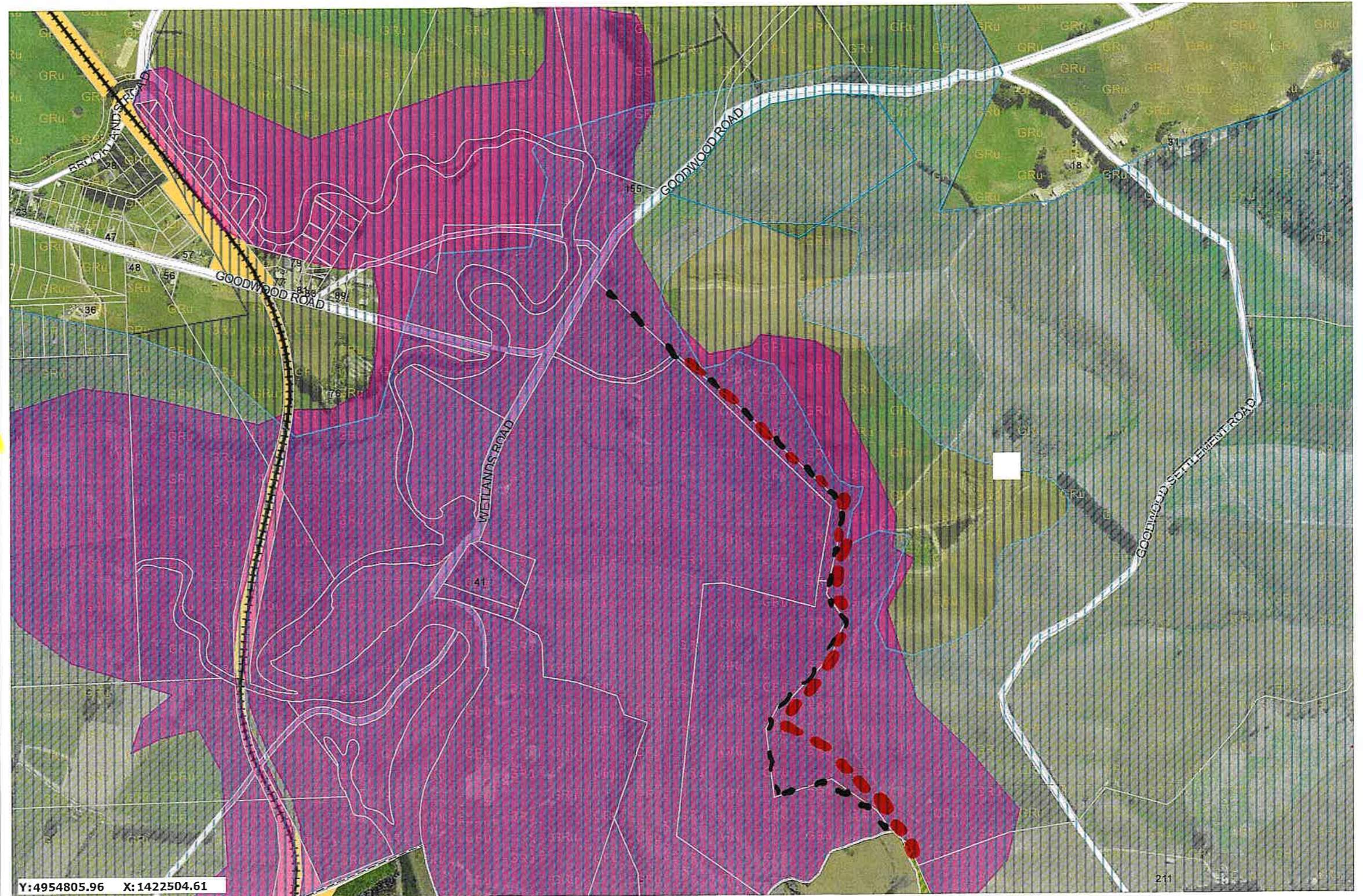


# Map B

## Map Content

### Layers

- Property, Planning Profiles and Have Settlement and Roads
- District Plan Draft - Precincts
- District Plan Draft - Historical and Cu
-  Label - Notable Tree
-  Label - Heritage Item
-  Notable Tree
-  Notable Trees (Group)
-  Character Contributing Building
-  Heritage Item (Point)
-  Heritage Item (Line)
-  Heritage Item (Setting)
-  Heritage Exclusion Area
-  Oamaru Historic Area
-  Sites and Areas of Significance to
- District Plan Draft - Coastal Environm**
-  Coastal Conservation Land
-  Coastal Protection
-  Coastal Environment
-  Coastal Area of Degraded Natural
- District Plan Draft - General District V
- District Plan Draft - Natural Hazards
- District Plan Draft - Natural Environm
- District Plan Draft - Infrastructure
- District Plan Draft - Hydro Electricity
- District Plan Draft - Zones
- ECAN Aerial Imagery 2021 (colours n
- Aerial Imagery
- LINZ Topo50 Maps
- LINZ Topo250 Maps
- Base Map



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211

Search geographic names

--- Existing current property boundary lines
















●●● Approximate edge of Pleasant River Estuary

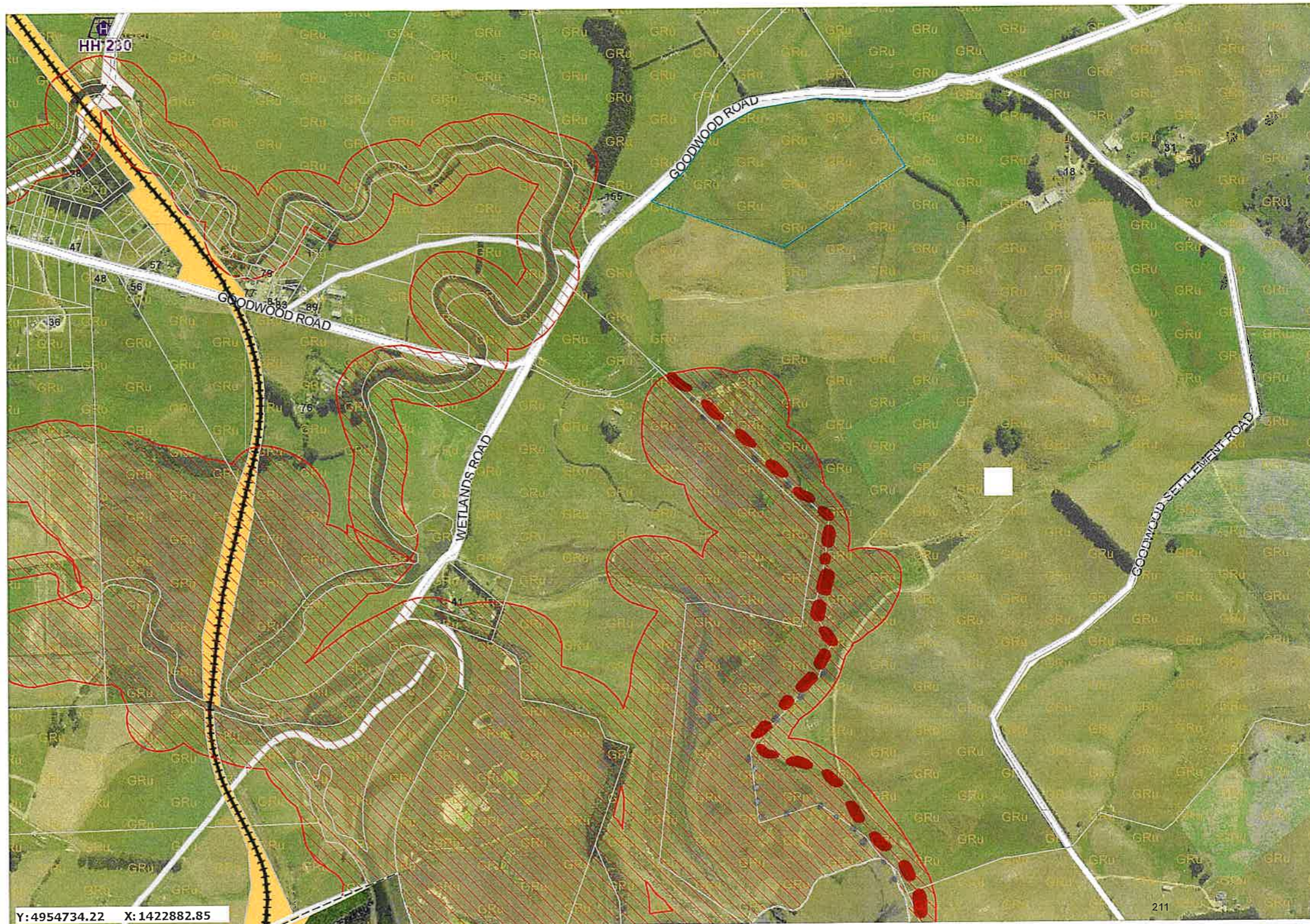


# Map C


## Map Content


### Layers

- Property, Planning Profiles and Have Your Say
- Settlement and Roads
- District Plan Draft - Precincts
- District Plan Draft - Historical and Cultural Value
-  Label - Notable Tree
-  Label - Heritage Item
-  Notable Tree
-  Notable Trees (Group)
-  Character Contributing Building
-  Heritage Item (Point)
-  Heritage Item (Line)
-  Heritage Item (Setting)
-  Heritage Exclusion Area
-  Oamaru Historic Area
-  Sites and Areas of Significance to Māori
- District Plan Draft - Coastal Environment
-  Coastal Conservation Land
-  Coastal Protection
-  Coastal Environment
-  Coastal Area of Degraded Natural Character
- District Plan Draft - General District Wide Matter
- District Plan Draft - Natural Hazards
- District Plan Draft - Natural Environment Values
- District Plan Draft - Infrastructure
- District Plan Draft - Hydro Electricity
- District Plan Draft - Zones
- ECAN Aerial Imagery 2021 (colours may vary)
- Aerial Imagery
- LINZ Topo50 Maps
- LINZ Topo250 Maps
- Base Map



Search geographic names

 Approximate edge of Pleasant River estuary

 Existing current property boundary lines