

DDPR_feedback_0159s	
Name	David Loten
Organisation	
Email	████████████████████
Response Date	Aug 29 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

**From EG and JC Loten  
105 Bobbys Head Rd Palmerston**

**A. General objection to the SNF process as it affects our property.  
Your definition of an ONF is as follows. “Technically an ONF is something that is created by “processes of nature, such as igneous and metamorphic activity , sedimentation , faulting and folding , glaciation and erosion.”**

A SNF is defined in the same terms as an ONF but is not outstanding only important. So by standard legal reasoning it has to be related to geological processes. So any assessment of our property in terms of geological criteria is flawed as it doesn't have cliffs, special rocks, or volcanoes etc. IF it has any special values they are vegetation values and should be assessed in vegetation terms not geological terms.

We consider it is important for SNF's to have consistent criteria throughout the district (and ideally throughout the country) and that they only capture the truly significant features. Otherwise all farmland is included and the whole process of protecting only the most special features is undermined. It is unclear to us what geological feature underlies the SNF. If it is the Goodwood Reserve, this is not a geological feature but a vegetative feature. There seems no underlying justification for the boundaries of the SNF. Possibly looking at aerial photos makes it look as though we are surrounded by native bush.

But if you look at the aerial photos you will see that the canopy of the Goodwood Reserve looks totally different from most of the “bush” that has been shown as SNF on our property. It looks different because it is. The Goodwood Reserve is not grazed and so has a much denser canopy, due to the impenetrable understory. Most of our property, being grazed, is actually pasture with a scattering of trees, and this explains the difference seen in the aerial photos. If you know what proper bush look like in an aerial photo you would not mistake our pasture with scattered trees for it.

Photo 1 shows proper bush and photo 2 grazed “bush”.



**Photo 1**



**Photo 2**

Photo 2 also shows the difference between the retired bush to the left of the photo and the pasture and scattered trees that comprises the bulk of your proposed SNF layer on our property.

## **Specific objections**

### **1 Natural Environment layer**

#### **a) Objection to SNF on the 5.82ha homestead block.**

This block of SNF is totally inappropriate as it covers the lower half of our drive and there are no natural geological features to be found. It is pasture plus scattered trees. There is nothing of significance vegetation wise that is not found in any garden urban or rural throughout NZ.

The drive is lined with big gum trees, (not natives and many are actually dead), the grass is heavily grazed to keep weeds down and has as many non native trees as natives. It can in no way be described as native bush, and has been grazed by cattle and sheep for a very long time. The grass is dotted with isolated trees and in no way looks like proper Goodwood Reserve bush. For these reasons it is nonsensical to say it is significant either feature or vegetation wise.

There seems to be no rhyme nor reason for the boundary of the SNF. **Please remove it in its entirety, see Map 1.**

#### **b) Objection to SNF on the 5.2285 ha grazing block.**

We object to much of the SNF that has been slapped on this grazing block. Much of it covers pasture and straggly trees, many of which are dead or dying of old age. Every time it is windy more trees come down as they have passed their use by date. See photo 4 which was taken from the road and 5 (an area which is not visible from public space), for clarity. (Please note that recent winds have resulted in several more large trees falling down, so there are even fewer trees than shown.)





**Photo 4**



**Photo 5**

**We would like the SNF to be removed in its entirety. If this is not possible at least peg it back to the line we have marked “internal grazing boundary” on the enclosed map, see Map 1.** This line largely follows an internal grazing boundary fence line that runs parallel to the Goodwood Reserve boundary and includes native bush that is outside the Goodwood Reserve but on our property and has not been grazed for the last 30 years, shown in Photo 1 earlier. It therefore contains native bush that is still all falling over due to old age but at least has some sort of canopy covering. It is distinctly different looking to the rest of our property because we have retired it from being productive.

It is not possible to retire all the land as it would be impossible to access our house, as well as pay our rates bills!

On aerial photos of our property the bush canopy of the retired area can be seen to be much more like the Goodwood Reserve. In the area identified as SNF the area is not forest but pasture with a scattering of trees that in an aerial photo looks like a forest! Many of the rest of the trees that appear largest in the aerial photos are exotic trees planted a long time ago and nearing the end of their life. Several are blowing down every time there is a storm event.

We note that photos 1 and 2 shows land that is not visible from any public place.

See attached Map 1 with areas marked for SNF to be removed.

## **2 The Coastal Environment layer**

The combination of Coastal Protection, Coastal Environment and Coastal area of degraded natural beauty covers much of our land behind our house, including a corner of our tennis court and half of our sheds. This seems unreasonable as there is nothing rural or scenic about our sheds or a tennis court. We appreciate it is largely grazed pasture with straggly natives and mature exotic trees, but closer to the house and tennis court it is garden and lawn. We submit the layers are just too extensive and unfairly impinge on our garden. We would like a little more garden to play with unhampered by extra rules, as the current boundary lines of the layers cover some of the most sheltered areas of my garden. Being sheltered means it is totally invisible from the road and any public areas.

I don't think many urban dwellers would appreciate being told which trees they could and could not plant in their gardens or where they could not put their outbuildings. I realise there are already existing setbacks and list of weed trees but this is much more invasive. Map 2 shows a suggested retreat of the Coastal Environment layers to free

up our rhododendron lawn and the sheds.

As for being able to see our land from public places, due to the contour, from Bobbys Head Road all you can see of our property is ordinary grazed farmland with a smattering of mixed trees. From the Goodwood Rd all you can see is our hay field. So there is nothing particularly special about us and the extent of the layers seems unfair. **Please redraw the Coastal Environment layer to allow us a bit more room.**

We spend most of our time keeping our land in good heart, grazing our fields , clearing fallen trees and trapping possums. We do not need extra rules to tell us what we can or cannot do. We foresee a future in which it will be either impossible or very expensive to continue to maintain the property. The council relies on its rural ratepayers funding district services and it should remember this when it imposes restrictions that devalue landholdings.

### **ACTIONS WANTED**

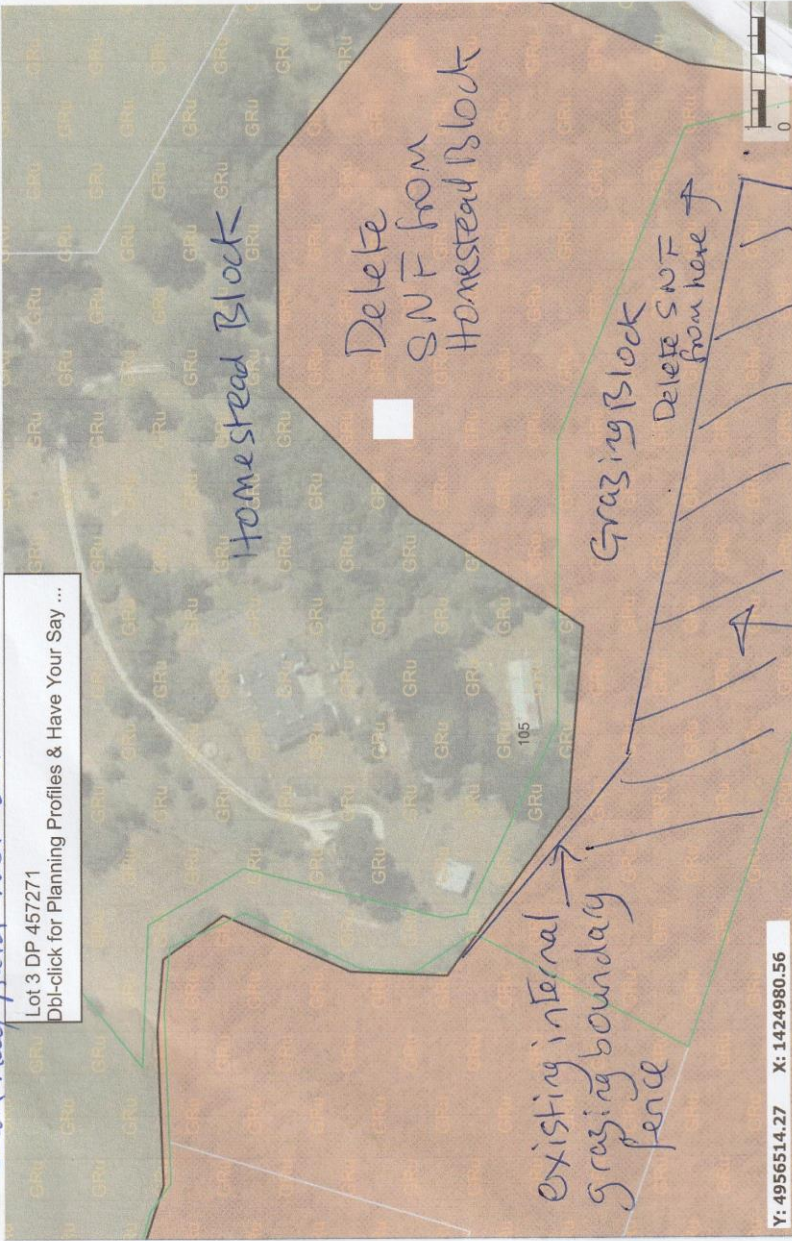
- 1. Please remove the SNF layer in its entirety from the Homestead Block, and partially from our Grazing Block, see Map 1.**
- 2. If this is not possible at least peg it back to the line on our Grazing Block that we have marked “internal grazing boundary” on the enclosed map, see Map 1.**
- 3. Please redraw the Coastal Environment layer on the Homestead Block to allow us a bit more room for my garden and the sheds. It is noticeably windier than it used to be and we use our sheltered spaces more than previously.**

Please confirm that this document has been received before the deadline date.



MAPI

Back hay field NOT SNF



Map 1



*Delete Coastal Environment layer from here*



Y: 4956298.2 X: 1425779.73

**Map Content**

Layers

- Property, Planning Profiles and Have Settlement and Roads
- District Plan Draft - Precincts
- District Plan Draft - Historical and Cu
- District Plan Draft - Coastal Environn
- 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 Environn
- District Plan Draft - Infrastructure
- District Plan Draft - Hydro Electricity
- District Plan Draft - Zones
- Aerial Imagery 2021 (colours may va
- LINZ Topo50 Maps
- LINZ Topo250 Maps
- Base Map

Search geographic names

MAP 2