DDPR_feedback_0055s		
	Name	Kate Macgregor
	Organisation	on behalf of Rogan and Michelle Borrie
	Email	kmmacgregor@outlook.com
	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	

R + M Borrie 940 Georgetown Pukeuri Road 15 KRD Oamaru

28th August 2022

Re: Draft Plan

To The Councillor's of Waitaki District Council

Please accept this letter as our submission regarding the Draft District Plan, that we send as a landowner in the Waitaki District.

We are writing in as the Draft District Plan has mapped and identified areas of significance on our property. We write as landowners to ensure we protect our Freehold Property Rights, for us as the current landowners, as well as protecting the rights of the future generation of landowners.

Based on the current mapping and rules within the draft plan we do not support the plan going forward in its current state. We have concerns regarding the rules themselves, as well as the evidence and methodology behind the mapping. We have listed these below as well as maps showing the extent of the mapping.

Valuation Numbers: 26170/05900 Legal Description: LOT 1 DP 300019 LOT 1 DP 337593 SEC 58A KAURU HILL SETTLEMENT LOT 2 DP 300019 Physical Address: 649 Kauru Hill Road, Maraeweka.

SNA 125 in Schedule 6 of the Draft Plan is defined as a 'relatively large area of broadleaved forest with some remnant and regenerating podocarps. The site lies mostly within an Acutely Threatened land environment and supports three At Risk plant species'. This proposed SNA lies along the slopes of the Kauru River and some of its tributary gullies.

SNA 126 in Schedule 6 is defined as 'a moderately-sized area of broadleaved forest, with some remnant and regenerating podocarps. The site also supports indigenous shrubland. The site lies mostely within an Acutely Threatened land environment and supports three At Risk Plant Species'.

As this area has not been surveyed by an ecologist it is not possible for the landscape architect to know the vegetation present along the Kauru River slopes and its tributaries, or the scale and area of this supposed forest. It would be impossible for a landscape architect to know how many, or if any, at risk plant species were present on the property.

Based on our knowledge as the farm owners, as well as that of the farm manager, who works intensely over these areas daily, we know there is not a large area of broadleaved forest and we dispute the classification that this is a Acutely Threatened Land Environment. The banks of the Kauru require significant investment in weed control as the dominant plant species would be gorse and wilding pines if left unattended.

We have identified an area, with assistance from a professional company that is dedicated to enhancing the environment and promoting sustainability, that we will allow to regenerate to native broadleaved forest. However, it was recommended that we assist with planting some broadleaf plants which supports our argument that this is not a large area of established forest. There are large areas within these outlined SNA's that are currently in developed pastures, that have been cultivated, subdivided and grazed by stock again showing the inaccuracies of this mapping.

We request that the mapping of these SNA's be reviewed with either the removal of the SNA's or a more accurate representation of the outlined SNA areas.



Picture: SNA 125 + SNA 126: 649 Kauru Hill Road, Kauru Hill.

Valuation Numbers: 26090/04201 Legal Description: LOT 4 DP 18813 LOT 1 DP 21271 Physical Address: 676 Gibson Road, Peebles.

ONF053 is the Te Ana Raki Limestone Escarpment that appears to be mapped along the Waitaki River. The definition of an Escarpment is "a long, steep slope, especially at one edge of a plateau or separating areas of land of different heights".

There is no visible escarpment along the length of this property and or evidence of Limestone.

We request the mapping of this Outstanding Natural Feature be reviewed, with the ONF outline being removed from our property due to the fact that there is no Escarpment.

SASM007 in Schedule 5 of the Draft Plan relates to the Waitaki River. We do not contest any of the values associated with the SASM however again the mapping is incorrect. A site visit was carried out

by the Otago Regional Council, requested by us as the landowners, to ensure we did not carry out any earthworks on what was legally classed as a riverbed. They confirmed that the site we visited was a Critical Source Area rather than any part of a waterway.

The outline of the ONF and SASM do not align, which you would expect if a limestone escarpment were present, as such we dispute the credibility of this mapping.

We request the mapping of this Site and Area of Significance to Maori be reviewed, with the SASM outline being removed from our property to reflect the guidance provided by the Otago Regional Council.



Picture: SASM 007 + NOF 053 – 676 Gibson Road.

Valuation Numbers: 26080/02700 Legal Description: LOTS 14-15 DEEDS PLAN 169 Physical Address: 217 Smillies Road, Georgetown. SASM016 is identified as Te Awamoko, the Awamoko Stream which runs along the south boundary of the property. There appears to be two boundaries drawn for SASM016 with one taking in substantially more land than the other.

The boundary of this drawn SASM is, at times, up to 60m from the Awamoko Stream on our property, which shows the margin of error in the mapping. We understand the significance of the Awamoko Stream and as part of our farming ethics, we continue to protect the values of the Awamoko Stream. However, the quality of the mapping along this boundary is inconsistent with the stream boundaries and natural territory.

We request the mapping of this Site and Area of Significance to Maori be reviewed with the boundary of the SASM reflecting that of the location of the Awamoko Stream and the natural boundaries it holds.



Picture: SASM 016 – 217 Smillies Road.

We appreciate your consideration of our submission and look forward to favorable discussions with the District Council as required.

Regards

Rogan and Michelle Borrie