Submission on Coastal Environment

Introduction

My wife and I farm deer, sheep, beef, and dairy grazers in Barrytown.

It must be remembered that we are farmers. Not lawyers, ecologists, or planners.

Therefore, our submission must be contemplated from the viewpoint of a farmer who is a private landowner. And that we purchased our land through lawful means with the intent of using it for a business, mainly farming. The land has been farmed for many years prior to us purchasing it. Some of it has also been mined. We have kept areas of native vegetation due to our regard for these areas.

We thank you for letting us have our chance to have a say on what happens to our land.

West Coast is unique

It seems it is often forgotten how unique the West Coast is. The hearing panel, planners and lawyers giving advice should be taking this into account.

Here are some statistics to show some of the obvious differences between the West Coast and other regions:

- 86% of the West Coast is under DOC control. (See Appendix A1) Many would say 88% but this map does not show that all West Coast riverbed land that is under DOC management.
- 42% of private land is in native vegetation. (See Appendix A3)
- The West Coast makes up just under 9% of New Zealand's land mass (see appendix A2)
- The West Coast has 26.1% of New Zealand's precipitation (see appendix A2)
- And has 29.5%; nearly one third of New Zealand's flowing water. (see appendix A2)
- NIWA stats show that our soils on average are saturated 120 days a year. (In comparison soil saturation in Canterbury may happen for one or two days every second year.)
- The longest region. (Further than the distance from Wellington to Auckland). (See appendix A16)
- The longest coast line (see appendix A16).
- Farms are few and far apart; approximately 650 full time farms.

When looking at these statistics you will find the rest of the country is quite the reverse. When the hearing panel make recommendations, it must be with these differences in mind.

Relief sought

The rule CE-R4 2 a i ; "a maximum height of 7m for new buildings" we ask for this to be changed to 10m like the rest of the rural zone.

The rule CE-R4 2 a iii I ; " a maximum of 200m2 per building for new buildings" we ask for this to have no limit like the rest of the rural zone.

That the Outstanding coastal natural character (OCNC) NCA40 be removed from our property title number RS 3250.

Height

Below is listed some of the everyday buildings that farmers use that would be more than 7m but less than 10m:

1. **Grain silo**
   Please refer to appendix A8 for a selection of typical grain silos. You will note the most common one used is the one high lighted (SIPCB12560L5). The reason for this is it has a 60 degree cone which allows for using meal type products (e.g. Palm kernel) to ensure these products flow properly. Also, it has the capacity of holding at least one unit load of product (30T). This is especially important for the West Coast farms that are few and far apart and most of the product put into these silos are freighted from other parts of New Zealand. All of the 60 degree cone silos are between 7.27m and 8.90m in height.
   You will note that the current price for this preassembled ready to install silo is $21,500, where to get a landscape architect in to assess the area for suitability, would add as much as $25,000 (appendix 4) with no guarantee of getting a consent. In fact you will note that the landscape architect said that "typically natural character dominates over human endeavours". It would not surprise to me if this is the case for the whole coastal environment as well.

2. **Fertiliser silo**
   We need to store fertiliser. On the West Coast we cannot just dump it on the ground like some parts of the country do. If fertiliser gets wet, it makes it impossible to spread.
   Please refer to appendix A10 for different types of silos available. You will see these range between 7.7m and 9.1m tall.

3. **Hay shed**
   I know of farmers making hay sheds 8m tall. We need to be able to store hay in a dry place. On the West Coast hay stored outside would rot. More farmers are looking into making hay because of the problems associated with plastic for silage, such as the carbon footprint and microplastic pollution (e.g. fish ingesting it).

Area

Below is a list of everyday structures and buildings that would be more than 200m2:

4. **Cattle yards**
   We need cattle yards to handle cattle in order to, weigh and drench them, for TB testing, load to them onto a truck and treatment of sick animals.
   The NPS-FW is encouraging farmers to have more cattle yards, because we need to bridge wide rivers (a wide river is greater than a meter wide at flood time), if we cross stock over these wide rivers more than twice a month. I have three situations where the cost of bridging is more than $100,000 and one would be $500,000. Where a kitset of a small yard holding 160 head of cattle would cost $20,000. These yards would be an area of 380m square. (Please see appendix A11 for a standard yard design and 2020 costs for a C160, which holds 160 head of cattle).

5. **Silage Pits**
   Farmers may be encouraged or forced to use more silage pits rather than individual silage bales, because less plastic gets used in silage pits which will result in less carbon emissions and microplastics.
   In the near future, these silage pits may have to be made of concrete to prevent the moisture from the silage leaking into waterways.
   Potentially a gravel sided pit may still be regarded a structure, if a gravel stop bank is considered a structure. (as suggested in the case of riparian margin of a river, lake or wetland chapter.)

We have 8km of "wide rivers" (as described in the NPS-FW stock exclusion rules) at our Barrytown property. Due to our unique climate conditions as described above West Coast farmers have a lot more "wide rivers". If I was to mow a 10 meter wide strip along each side this would be the equivalent of 16 ha of area. Mowing this area would eliminate some the difficulties associated with native vegetation beside waterways, as we explained in the natural character and margins of waterbody's chapter. It would also, make use of what the stock would not eat due to the NPS stock exclusion rules.
There would be a further 14 ha of paddocks used for silage instead of being grazed, because these paddocks would be too difficult to manage, due to the stock exclusion rules. The total area mown would be 30ha; the silage pit would require an area of 533 m2 (calculations are in appendix A12). This is over double the allowable area.

6. **Feed pads**
   The NPS-FW would like to see every feed pad/standoff pad that is not roofed, be concreted. By the TTPP's definition of a structure, I would expect a large concrete area would be considered a structure. Farmers on the West Coast use feed pads far more than any other area in New Zealand due to our unique weather and difficulties with saturated soils (see above).
   A common nationally recommended area per adult cow is 10m2 for an outdoor feed pad. A 500 cow farm would need a 5000m2 (half a hectare) concreted area. Twenty five time bigger than the current recommended rules.

7. **Hay shed**
   Using the above example of 30 hectares made into hay instead of silage, a shed would need to be 288m2 at a hight of 8m (See appendix A13 for calculations).

Adding to structures

Under the proposed rule, CE-R4, it is unclear if adding to an existing building or structure is allowed without obtaining a resource consent. Other rules (e.g. CE-R8) specifically refers to adding to structures or buildings. So I have made the assumption if the total area of the old and new building or structure becomes more than 200m2 then there is a requirement for a consent.

8. **Deer shed and yards**
   You will see a design change in appendix A14, I plan to do one day to my deer shed to make stock flow better. This change could require a resource consent for two reasons. Firstly because the deer shed is in a SASM and secondly it is in a coastal environment.
   If we needed to get an archaeologist report because of the SASM as mentioned in my submission on SASM's it would cost $25,000.
   A further cost of $25,000 for a landscape architect because the structure is more than 200m2. This does not include the consent costs, nor does it guarantee me getting a consent.
   An enormous amount of money, $50,000 dollars, just to ask to build an extra pen that would cost about $2000 in posts, rails and gates.

Political changes

9. Local New Zealand politics have shown, for example NPS-FW, that we need to be ready to change and to be able to adapt and change quickly. In some situations, as described with feed pads we were only given a year to comply.

10. International politics are the same. China changed their importing laws, which only gave us velvet farmers six months to upgrade our deer sheds to food handling standards.

Although this didn't change the area of the deer shed other rule changes could. For example, the dairy industry has had to put a concrete pad down where the tankers park to collect milk. This could potentially be considered an increase to the area of the dairy shed.

Market changes

11. To supply to Fonterra farmers must keep all their calves to a minimum age of 4 to 7 days. This will require more shed space. Westland dairy could follow suit one day.

12. Nestle have just announced that they would like to see farmers in New Zealand keeping all calves through to 9 months of age. Nestle are saying their markets are demanding this, so this may become compulsory in the near future.
This will require a lot more shed space. You will see by my calculations for a 500 cow dairy farm, this will require an extra shed area of 812.5m2 (see appendix A15).

13. Will the councils be able to process all the consents if there are fast (within six months as described above) compulsory changes?

14. Will the farmers be allowed to change in these coastal environment areas. You will note that the landscape architect said, "usually in such areas, natural character dominates over human endeavours". I expect this to be the same for the coastal environment.

15. Not being allowed to change could put us out of business.

Farming styles change

16. Fifteen years ago there were 8 farms on the Barrytown flats. There are now only 4 farms. The change is due to things like economies of scale and machinery getting bigger and more efficient, so one person can take care of more land. As a result some sheds, yards and other structures are no longer needed, however the farmer may want to centralise things and build yards etc in a more central area so the stock don't have to walk as far. The rules in this chapter do not allow for these changes. Having the same rules as the rest of the general rural zone will allow for this.

Private property rights

17. Mark Cameron ACT MP released a statement on the 1st of October saying "Section 6 of the Resource Management Act has given local bureaucrats broad powers to run roughshod over property rights. The good news is the Government is in the process of amending, repealing, and replacing the RMA. With ACT in Government, Andrew Hoggard and Simon Court are putting property rights at the centre of new resource management rules." (See appendix A17).
We agree that all things that have come out of section 6 of the RMA have eroded private property rights. This includes OCNC's.

18. Mark Cameron goes on to say "This begs the question, why is Gore District Council proposing such a massive change that is likely to be made untenable by new legislation? It's not just a land grab, it's a waste of time, money, and attention." We would suggest that the commissioners and the TTPP committee need to listen to this change in direction from the government so that our West Coast rate payers don't see this "land grab" and "a waste of time, money, and attention."

19. A suggestion for the commissioners and the TTPP committee is to leave all section 6 matters of the RMA out of the TTPP, until such time it has become clear from the government what the new RMA will be like. In a

TTPP committee meeting, there was a suggestion by a planner, that to remove SNA's out of the TTPP would be an expensive exercise for SNA's. However, Mayor Gibson has pointed out that just the SNA process cost the GDC about $1m 15 to 20 years ago. If this cost of $1m was to be extrapolated out to all matters arising out of section 6 it would cost the councils millions. This is what Hon. Mark Cameron was pointing out when he said, "it's a waste of time, money, and attention."

NCA40

We sent the commissioners a letter requesting NCA40 be removed from our title RS 3250. We decided to include this request in this submission.

We are requesting that the outstanding coastal natural character (OCNC) on our property be removed. Point 510 (in the section 42A report) requested more information on our submission point 415.014.

The NCA40 is on title number RS 3250. Please refer to Appendix 1 and a more detailed version appendix 2

The reasons for this OCNC NCA40 being decided upon as being identified are in Appendix 3. However, there are some points from that appraisal that we would like to refer to that we feel are inaccurate for the area on our land. We need to point out we are farmers not landscape architects, so the information below is written from a laypersons point of view.

Points from the appraisal

20. Sequence **of rolling to steep coastal hills and valleys**
The area we own is flat. In fact, all the area to the west of SH6 is flat.
We disagree with this point.

21. Varied amalgam of exposed landforms, very strong elevated relief
A layperson would not expect to see exposed landforms and elevated relief on flat land. The area of NCA40, on our land is flat.
We disagree with this point.

22. Windswept vegetation
The vegetation is not windswept. It is upright growing white pine Kahikatea.
We disagree with this point.

We feel that the mapping has been inaccurate. Such as including modified humped and hollowed land and including DOC land.

Points of inaccuracies

23. Humped and hollowed land.
If you look at the photo in Appendix 2 you will see an area that has been humped and hollowed, that should have been excluded from the OCNC. There is nothing natural about it. If our land had been properly physically assessed this area on our land may not have been included.

24. DOC land
All the rest of the land between Lawsons creek and Burke rd. on the Western side of SH6 that has the NCA40 over it is under the administration of DOC. We are of the understanding that the study that identified Outstanding Landscapes and Natural Features was located in areas outside of public conservation lands administered by the Department of Conservation (which are already offered some protection).
This clearly demonstrates more inaccuracies with the mapping.

It has been suggested, by a TTPP planer, that you the commissioners, may require us to get "comment" from a landscape architect to support/justify our request. We disagree with this idea.

Using a Landscape Architect

25. Cost

We got a quote from a landscape architect to do this work, and it would cost up to $20,000 to get this work done. Please see Appendix 4 for this quote.

26. Who should bear this cost

It would appear to us that the work done to decide on making NCA40 has been inaccurate. It would seem unusual to us that the cost would then fall on the private landowner to rectify this mistake.

Other assessments of this area

27. Wetland assessments:

This area was originally identified as a significant natural wetland SNW. The regional council expert came and examined this and decided it was not a SNW. Then it went through the environment court and a desktop review from DOC resulted in it being back in again and the regional council had to get experts out again to review it. It was again decided that it was not SNW.

28. SNA assessments

The GDC decided it may be a Significant natural area SNA (PUN-Wo34). So we decided to get the nature heritage fund and DOC involved. DOC got their experts out and assessed it (please find the report in Appendix 5). From a laypersons point of view it said it was not worth purchasing or buying, but possibly good enough to be a SNA.

To me what DOC are saying is because they can get control of it for free, they won't buy it. Dr Muriel Newman sums this up nicely in her document Private property rights, and wrongs. "My prediction is that the confiscation of property rights without compensation, under the guise of conserving the environment for future generations, will continue unabated until a 'no regulation without compensation clause is introduced into the resource management act."

29. Formal request

We formally request that this area of NCA40 be removed from our title RS 3250. This will be in the best interests of the rate payers, so that they do not need to pay for more expert assessments of this area.

Section 32

30. We could not find any meaningful section 32 financial analysis or quantitative analysis done for the coastal environment or the OCNC/HCNC, ONF and ONL. I hope that some of my above-mentioned costs in the "height", "area" and "adding to structures" section of my submission may help with the understanding of the financial impacts of the coastal environment rules.

31. We could not find any suggestion in the regional policy statement or in the section 32 analysis, that suggested that the rural zone within the coastal environment should be treated any differently to the rural zone outside the coastal environment.

32. Section 32 analysis is supposed to assure the councils that the planning mechanisms they choose will work. Section 6 is hugely problematic with issues around mapping and rules over private land. These do not meet

the section 32 effectiveness, efficiency, best planning mechanism tests and fail to achieve the purpose of the RMA as evidenced by the governments intension to change section 6, as part of the RMA reform. We therefore recommend all matters out of section 6 be removed from the TTPP until the government sorts this section out (as Mark Cameron ACT has declared that they will do).

Conclusion

33. The commissioners and the TTPP committee need to listen to the change in direction from the government and their proposal to make section 6 of the RMA fair for the private property owners. The current governments intention is to change the RMA for the betterment of private property owners.

34. We request the rule CE-R4 2 a i ; "a maximum height of 7m for new buildings" to be changed to 10m like the rest of the rural zone.

35. We request the rule CE-R4 2 a iii I ; " a maximum of 200m2 per building for new buildings" to be changed to, no limit like the rest of the rural zone.

36. I could not find anything in the regional policy statement etc stopping the commissioners from recommending the coastal environment rules for structures be any different from any other general rural zone.

37. We request that the Outstanding coastal natural character (OCNC) NCA40 be removed from our property title number RS 3250.

38. We recommend that all matters from section 6 of the RMA be removed from the TTPP.

Appendix A1

THE WEST COAST & ITS FOREST LANDS

1919 - 1987

NEW ZEALAND FOREST SERVICE was created in 1919 to control the cutting of indigenous forests and establish exotic forest plantations as an alternative source of construction and building timbers.

This service took responsibility for wild animal control from Internal Affairs in 1950's and began developing tracks and huts in the back country, providing recreation opportunities.

Experimental exotic forests were established at Totara Flat and Mahinapua. Tree seedlings were produced from nurseries at Woodstock and Totara Flat. Plantations of Pinus radiata, Lawson's Cypress, Douglas Fir, Eucalyptus species and other minor species were planted on the West Coast.

Nelson and Westland Conservancy boundaries were restructured in 1979 – 80 with Buller and Inangahua Districts included in Westland. District and Station boundaries in Westland Conservancy were restructured in 1981. Westland Conservancy Headquarters remained in Hokitika. With District Offices at Reefton, Hokitika and Harihari and Station Offices at Westport, Reefton, Totara Flat and Greymouth serviced West Coast State Forests from Kahurangi Point to Big Bay.

For over 68 years the N.Z. Forest Service was responsible for administering the Forest Act, Forests and Rural fires Act, Mining Act, Wild Animals Control Act, Timber Preservation Act and other Government Legislation until re-structured out of existence in 1987.

Responsibilities were broad and grouped between: Administration, Planning and Operations sections.

Briefly:
Management & Planning
Administration & Clerical
Research & Forecasts
Environmental
Training
Surveying & Draughting
Roading & Bridges
Transport & Mechanical
Safety & Equipment
Radio Communication
Timber Cruising
Logging, Scaling & output
Controlled Fire Burn off
Land Clearing
Planting
Pruning & Thinning
Fertilising & Spraying
Harvesting & Marketing
Weather Readings
Stores Management

Mahinapua Dept Research 1958

Hokitika Conservancy Office Built earlier1970,s

Land Clearing & Plantation

Controlled Burn

Wild Animal Control & Recreation Hut

WEST COAST TOTAL AREA	2 288 000 ha	
Gazetted Protected Natural Areas.	441 000 ha	(19%)
Other State Owned Protected Land. *	1 237 000 ha	(54%)
State Owned Land Suitable for Production Forestry.	287 000 ha	(13%)
Other Land (freehold, leasehold, etc).	323 000 ha	(14%)

* for Soil & Water Conservation

(Figures from N.Z. Forest Service Management Plans)

SCALE 1:1 000 000

Kilometres 0 5 10 20 30 40 50 60 70 80 90 100

CJD

"This interpretation panel was placed as part of ex New Zealand Forest Service Workers Get Together 2012 – Twenty Five years after restructure and revised for 2017 – Get Together"

Appendix A2:

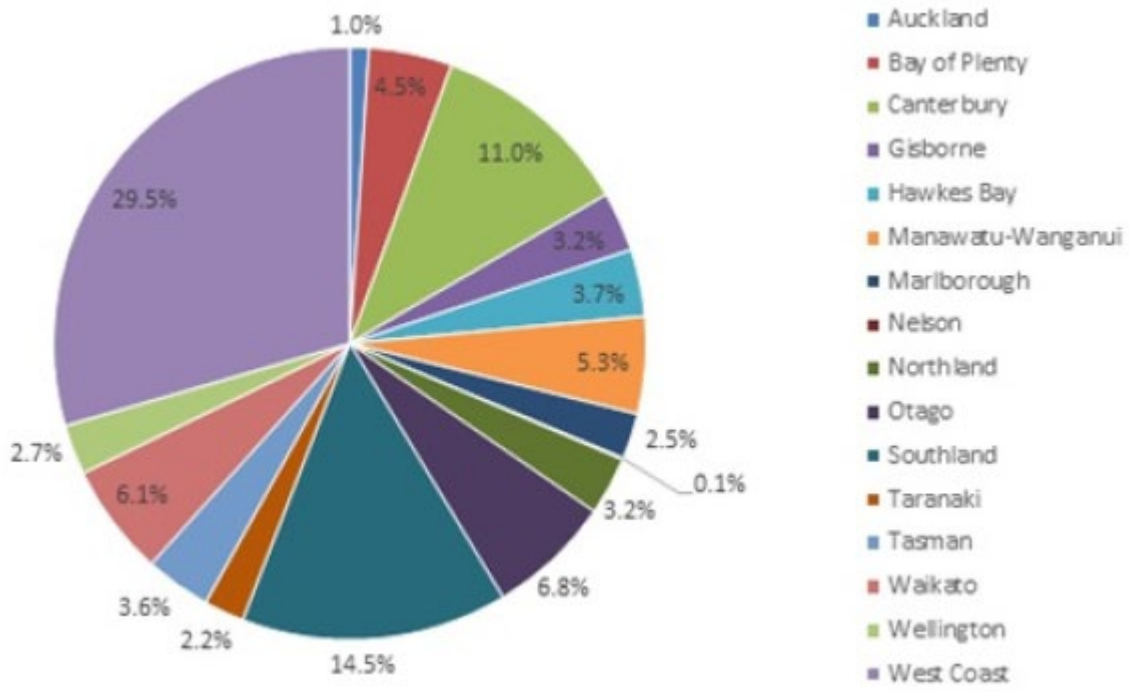
06 June 2017

Water resources are important to New Zealand's economy and electricity supply and we are fortunate to receive as much precipitation as we do. Compared with many other countries New Zealand is relatively water-rich. But this abundance varies from year to year, month to month, and region to region, leaving some places with too much at times (flooding) or too little (drought).

To quantify this resource and its variability NIWA has developed a pair of models that allow us to estimate how much precipitation falls anywhere in New Zealand (the Virtual Climate Station Network) and how this precipitation becomes river flow (TopNet). These models are invaluable in providing numbers where the existing precipitation and river flow measurements do not go.

Based on the latest 20 years of analysis, New Zealand receives about 550,000 million m^3 of precipitation in an average year – 9 times the volume of Lake Taupo. From year to year this may vary as much as 15% higher or lower. The West Coast receives a quarter of this precipitation despite accounting for less than 10% of the country's area.

About 20% of the national precipitation in turn evaporates after it lands, with the remaining 80% flowing out to sea and hence become our surface water resource. The West Coast again represents the largest portion regionally (Figure 1), demonstrating that regions are not equally endowed with freshwater resources even after taking their areas into account.



NIWA

The proportion of New Zealand's average surface water resource by region. Regions run alphabetically and clockwise from Auckland's 1% at the top

NIWA applies these models in a range of applications from the catchment to country, and from historical conditions to potential future conditions under different land-use or climate change scenarios. The resulting information helps guide freshwater managers and users as well as shedding light on the natural history of New Zealand.

Further information

For further information see the report *Surface water components of New Zealand's national water accounts*.

Collins, D., Zammit, C., Willsman, A., and Henderson R. (2015). Surface water components of New Zealand's National Water Accounts, 1995-2014. NIWA client report CHC2015-013, pp. 18.

Freshwater Update 70, August 2016

- The Water Accounts of New Zealand
- What happens when communities monitor their local streams?
- LIFENZ: A hydrologically sensitive invertebrate community index for New Zealand rivers

- NIWA Eddy Covariance Towers
- That sinking feeling
- Rapid and highly variable warming of lake surface waters around the globe
- Latest Freshwater and Estuaries News

Results and discussion

Land use

Sheep and beef farming is the most extensive land use in New Zealand, accounting for 40% of the total land area (Table 1). Public conservation land is the second most extensive at 31%. In contrast, dairy farming (10%) and plantation forestry (7%) occupy a substantially smaller area while urban areas account for <1% of the land area nationally. Regionally, sheep and beef farming accounts for a larger proportion of the regional land area than public conservation land in all regions except Bay of Plenty, Nelson/Tasman, West Coast and Southland (Table 1). In the Bay of Plenty, plantation forestry (24%) and other land uses (mainly horticulture; 28%) are unusually high, while in Nelson/Tasman, West Coast and Southland, large national parks (Kahurangi and Nelson Lakes National Parks, Paparoa, Taipoutini/Westland and Aspiring National Parks, and Fiordland and Rakiura National Parks respectively) and other areas of land managed under the Conservation Act account for the dominance of public conservation land.

Table 1. Percentage of land area in different land uses.

Region	Area (ha) of region	Percentage of region's land area in different land uses					
		PCL	Sheep & beef	Dairy	Plantation	Urban	Other
New Zealand	26,732,864	31.0	39.7	10.1	7.1	0.6	11.5
Northland	1,254,033	11.3	40.8	18.7	14.0	0.5	14.6
Auckland	491,639	6.0	34.1	11.9	9.7	8.5	29.9
Waikato	2,459,318	15.5	31.3	28.4	10.6	0.7	13.4
Bay of Plenty	1,225,530	22.4	14.0	11.5	23.7	0.8	27.6
Gisborne	835,947	9.1	62.4	0.5	19.5	0.2	8.2
Hawke's Bay	1,417,695	13.7	52.8	3.3	13.0	0.4	16.9
Taranaki	726,088	19.2	33.8	34.0	4.1	0.6	8.3
Manawatu-Wanganui	2,221,561	17.8	56.0	8.7	5.9	0.4	11.2
Wellington	812,506	16.4	52.8	5.6	7.2	1.9	16.1
Marlborough	1,049,444	27.1	52.2	2.2	7.9	0.2	10.4
Nelson & Tasman	1,007,973	63.3	11.0	5.1	12.5	0.4	7.7
West Coast	2,335,571	84.4	3.5	5.1	2.5	0.1	4.5
Canterbury	4,523,554	25.8	49.0	9.3	1.7	0.4	13.7
Otago	3,187,643	19.2	64.3	4.8	4.0	0.3	7.4
Southland	3,183,858	57.9	25.4	8.7	2.4	0.1	5.5

Based on these data it is clear that despite changes in the nature of land use over recent decades (e.g. declines in the national sheep flock and conversions to dairy farming and viticulture; MacLeod & Moller 2006, Fetzel et al. 2014), sheep and beef farming is still the predominant land use across New Zealand. Although not assessed here, we also know from other research that sheep and beef farming typically occurs at lower elevations and in regions where there is less public conservation land (Mark 1985, Awimbo et al. 1996, Norton 1999, Leathwick et al. 2003).

Native vegetation

Nationally, native vegetation (forest, shrubland, grassland and wetland) covers 43% of New Zealand (Table 2). However, much of the native vegetation present today is very different to what would have been present before human settlement, when ca. 80% of New Zealand was forested. Many of the areas that support native shrubland and grassland today occur in areas that were previously forested. Of the native vegetation present today, the majority (62%) occurs on public conservation land, although a substantial amount (25%) occurs on sheep and beef farms. This 2.8 million ha of native vegetation on sheep and beef farms accounts for about 27% of the total area (10.6 million ha) of all sheep and beef farms.

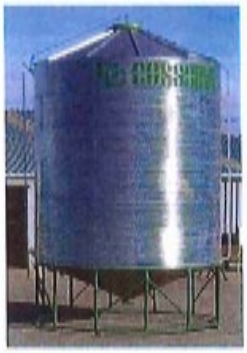
Table 2. Total native vegetation in different land uses.

Region	% region in native vegetation (area ha*1000)	Percentage of total native vegetation in different land uses					
		PCL	Sheep & beef	Dairy	Plantation	Urban	Other
New Zealand	43.0 (11,490)	61.5	24.5	1.4	2.8	0.0	9.8
Northland	31.5 (395)	31.4	29.7	7.8	7.3	0.0	23.8
Auckland	25.0 (123)	20.0	23.7	3.2	3.9	0.0	49.3
Waikato	26.4 (650)	52.4	23.0	4.3	5.7	0.0	14.6
Bay of Plenty	49.1 (602)	43.4	8.0	3.0	6.7	0.0	38.8
Gisborne	31.7 (265)	27.5	52.7	0.4	7.8	0.0	11.5
Hawke's Bay	33.7 (477)	38.7	20.0	1.1	10.5	0.0	29.7
Taranaki	39.5 (287)	47.2	33.2	4.9	5.4	0.0	9.3
Manawatu-Wanganui	32.9 (731)	51.8	26.7	0.8	3.7	0.0	17.1
Wellington	36.0 (293)	40.2	31.2	0.7	4.1	0.0	23.7
Marlborough	51.4 (540)	47.1	42.1	0.7	3.3	0.0	6.8
Nelson & Tasman	69.0 (695)	86.0	4.8	2.0	2.8	0.0	4.4
West Coast	80.0 (1,868)	93.5	1.6	1.2	1.1	0.0	2.6
Canterbury	33.2 (1,500)	47.9	48.0	0.6	0.5	0.0	3.1
Otago	37.9 (1,207)	40.5	56.1	0.2	0.8	0.0	2.5
Southland	58.3 (1,856)	87.4	8.9	0.3	0.4	0.0	3.1

These figures for native vegetation do not provide any breakdown of the type of vegetation or its quality, but they do indicate that there is still substantial native vegetation across rural New Zealand. The figures for sheep and beef farms do include some of the nearly 200,000 ha of rural New Zealand that is covenanted through the QEII National Trust (openspace.org.nz), of which 54% occurs on sheep and beef farms (about 100,000 ha). However, given that the total area of native vegetation on sheep and beef farms is nearly 3 million ha, the majority (97%) is not covenanted (although some of this might be included under other protective agreements such as through the Ngā Whenua Rāhui programme or under MPI sustainable forestry management plans and permits).

While the amount of native vegetation remaining on sheep and beef farms is impressive, this figure is influenced by the inclusion of substantial areas of native grassland, especially in the eastern South Island (Marlborough, Canterbury, Otago and Southland). Because New Zealand was predominantly forested before human arrival and because most sheep and beef

Appendix A8



DAN COSGROVE 2014 LTD

Effective Pricing April 2024 (ex-gst)

CB-30° TRANSPORTABLE SILO'S

Standard Tubular Cone Base Silo –
Height under valve 560mm, Valve ID 430mm
Overall height includes 390mm height of Top Hat Pivot Bracket

DCL Part Number	Model ft /ring	Diameter (m)	Cubic (m)	Overall Height	Wheat (Ton)	Barley (Ton)	PKE (Ton)	Price (ex-gst)
SIPCB123	12/3	3.66	33.6	5.37	27	23	21	$12,695.00
SIPCB124	12/4	3.66	42.2	6.19	34	28	26	$14,470.00
SIPCB125	12/5	3.66	50.8	7.00	41	34	32	$15,325.00
SIPCB126	12/6	3.66	59.4	7.82	48	40	37	$16,995.00

Specification: Corrugated galvanized walls, galvanized roof c/w ladder, outside wall ladder, safety-cage, self-opening lid, painted steel pipe cone base c/w manhole.

HL TRANSPORTABLE SILOS

High Leg Five-Legged Cone Base Silo
30º Height under outlet 1.5 metres
45º Height under outlet 810mm
60º Height under outlet 680mm
Overall height includes 390mm height of Top Hat Pivot Bracket

DCL Part Number	Model ft /ring	Diameter (m)	Cubic (m)	Overall Height	Wheat (Ton)	Barley (Ton)	PKE (Ton)	Price (ex-gst)
SIPCB123L5	12/3-30°	3.66	31.6	6.11	25	21	19	$13,970.00
SIPCB124L5	12/4-30°	3.66	40.2	6.93	32	27	25	$14,405.00
SIPCB125L5	12/5-30°	3.66	48.7	7.74	39	33	30	$15,240.00
SIPCB12345L5	12/3-45°	3.66	34.3	6.11	27	23	21	$15,205.00
SIPCB12445L5	12/4-45°	3.66	42.9	6.93	34	29	27	$15,880.00
SIPCB12545L5	12/5-45°	3.66	51.4	7.74	41	35	32	$16,700.00
SIPCB12360L5	12/3-60°	3.66	40	7.27	32	27	25	$19,630.00
SIPCB12460L5	12/4-60°	3.66	48.6	8.09	39	33	30	$20,465.00
SIPCB12560L5	12/5-60°	3.66	57.1	8.90	46	39	35	$21,500.00

Specification: Corrugated galvanized walls, galvanized roof c/w ladder, outside wall ladder, safety-cage, self-opening lid, painted steel base on five legs at 2.0m spacing's, cone base c/w manhole.
Galvanized base available POA

Capacities are approximate only, include 5% for compaction and are based on Wheat density at 770 kg per cubic meter, Barley density at 653kg per cubic meter & PKE density at 630kg per cubic meter.

ALL PRICES ARE EX-DCL FACTORY TIMARU AND EXCLUDE GST, SUBJECT TO SPECIFICATION AND PRICE CHANGE WITHOUT NOTICE

Appendix A10

Hi George,

Thank you for your phone call this morning.

Please see the below Ravensdown Silo Dimensions. These measurements can vary from site to site.

Large Silo (*Subject to availability*)

- **26cu.m** silo on 3.0 metre legs (3.0 metre clearance under valve).
- Distance between legs - 3.4 metres.
- Maximum height - 8625mm above ground level.
- Cone angle - 50 degrees.
- Capacity is approximately 19 tonnes of high analysis fertiliser.
- Flip top lid for auger filling.
- 100mm blow in pipe and camlock fitting for pneumatic filling.
- Larger opening at the bottom - 400mm.
- Plastic Roto tank with steel support frame.
- Weather and Bird Proof.
- 5 sight glasses.
- Sealed lockable shut off mechanism.
- Dyna Bolted to concrete pad/blocks.
- $170.00 + GST per month excluding concrete pad/blocks.
- $180.00 + GST per month including concrete pad/blocks.

Large Wide Leg Silo (*Subject to availability*)

- **26cu.m** silo on 3.0 metre legs (3.0 metre clearance under valve).
- Distance between legs – 4.25 metres.
- Maximum height - 9100mm above ground level.
- Cone angle - 50 degrees.
- Capacity is approximately 19 tonnes of high analysis fertiliser.
- Flip top lid for auger filling (on request)
- 100mm blow in pipe and camlock fitting for pneumatic filling.
- Larger opening at the bottom - 400mm.
- Plastic Roto tank with steel support frame.
- Weather and Bird Proof.
- 5 sight glasses.
- Sealed lockable shut off mechanism.
- Dyna Bolted to concrete pad/blocks.
- $190.00 + GST per month excluding concrete pad/blocks.
- $200.00 + GST per month including concrete pad/blocks.

Small Silo – ***please check availability first as manufacture has ceased. A reconditioned option may be available (i.e. if one has been removed from another farm)***

- **19cu.m** silo on 3.0 metre legs (3.0 metre clearance under valve).
- Distance between legs - 3.2 metres.
- Maximum height - 7700mm above ground level.
- Cone angle - 50 degrees.
- Capacity is approximately 14 tonnes of high analysis fertiliser.
- Not possible to auger fill.
- 100mm blow in pipe and camlock fitting for pneumatic filling.
- Opening at the bottom - 300mm.
- Sock length - 1.2 metres.
- Plastic Roto tank with steel support frame.
- Weather and Bird Proof.
- 3 - 5 sight glasses.
- Sealed lockable shut off mechanism.
- Dyna Bolted to concrete pad/blocks.
- $100.00 + GST per month excluding blocks.
- $110.00 + GST per month including blocks.

Our customers should always check with their local council to see if Building Consent is required.

Kind regards,

Keely Kira
Customer Agri Support

p. 0800 100 123 | **f.** 0800 100 118 | **e.** customer.centre@ravensdown.co.nz
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Opening hours: Monday – Friday: 7:00am - 6:00pm, Saturday 8:00am – 12:00pm

Appendix A11

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www.greenwoodinfo.co.nz

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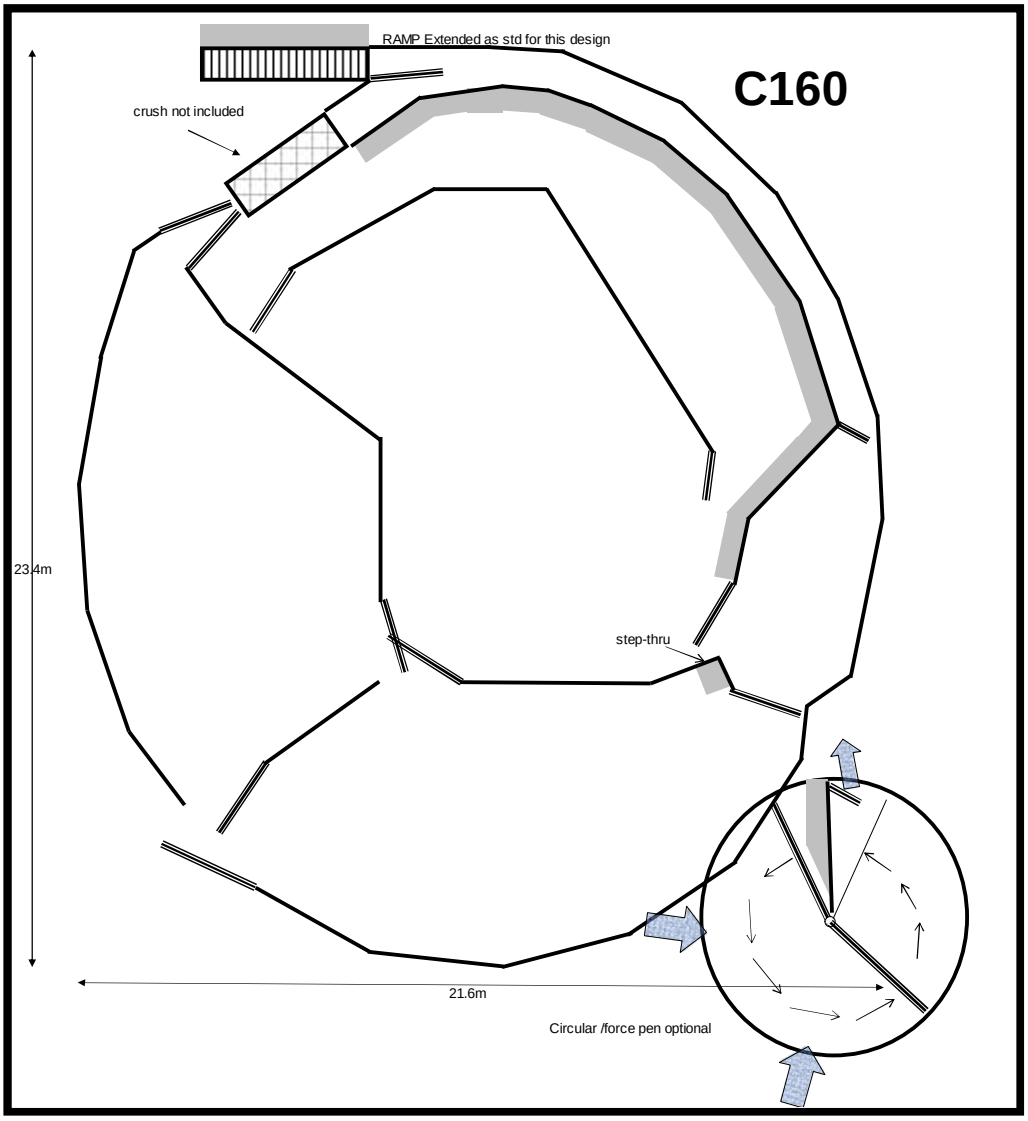
Cattle Yards

Detailed Designs, Full Kitset, One Delivery*

Strong. Quiet. Very Economical. Great Stock-flow.

RRP $14171+gst



RAMP Extended with 1.5m flat-floor as standard for this design

125mm Bugle screws – to upgrade from 125mm nails to 125mm bugle screws add 3.5% of the RRP

Please note:

- **PEACE OF MIND** - only strong, heavy duty materials are specified. We are absolutely committed to achieving significant yard strength and our buying power ensures the Greenwood kitset yards are very cost effective.
- PRICE - The price above is the price to the farmer and delivered to farm subject to farm location and unloading facilities available on arrival. Extra subsidised freight costs may apply. Prices may change without notice. Standard GreenWood terms of sale apply.
- INCLUSIONS: All H4 strainers for yards, heavier / longer strainers for gates, heavy poles for ramp, all H3.2 GreenWood 150x50 Cattle Yard Rails timber for rails, ramp, catwalk(s) and 150x32 for timber gates (if timber gates needed), all fixings, spray paint, detailed waterproof laminated assembly plans noting all construction details, construction and design advice. **Strainer spacings are intentionally at close centres to provide seriously durable, strong yards.** For yards with a capacity over 30 cattle GreenWood has allowed for extra strainers as spares and all yards allow for spare timber. Timber gates supplied as loose materials to be made into gates on site as per the GreenWood plans. Steel gates (if ordered) arrive ready to hang.
- EXCLUSIONS: concrete, any site works / assembly, crush, bail, drafting system unless specifically stated, steel gates.
- OTHER - Timber and fixings for gates can be removed from kitset if required, with corresponding reduction in price. Cost of hot-dipped galv steel gates can be added if required. Illustrations are as close to exact scale as possible, some slight variation may occur.
-

JAN 2020

GreenWood exclusive agent - PGG Wrightson

Appendix A12

8000 kg DM of grass harvested per ha

180kg DM per cubic meter in a silage pit

30ha cut

2.5m high pit

30 x 8000 ÷ 180 = 1333 m3

1333 ÷ 2.5 = 533 m2

Appendix A13

8000 kg DM of grass harvested per ha

30ha cut

4m wide by 9m deep bays

Bales stacked at 3 wide, by 7 long, by 6 high

3x6x7 = 126 bails per bay

126 x 250 = 31,500 DM per bay

240,000 ÷ 31,500 = 7.6 bays (so 8 bays required)

8 x 4 x 9 = 288 m2

Appendix A15

500 cow farm, with 90% calf survival.

This farm would already have shed space for 25% replacements.

Recommended area per calf = 2.5m2 (Dairy NZ recommendations).

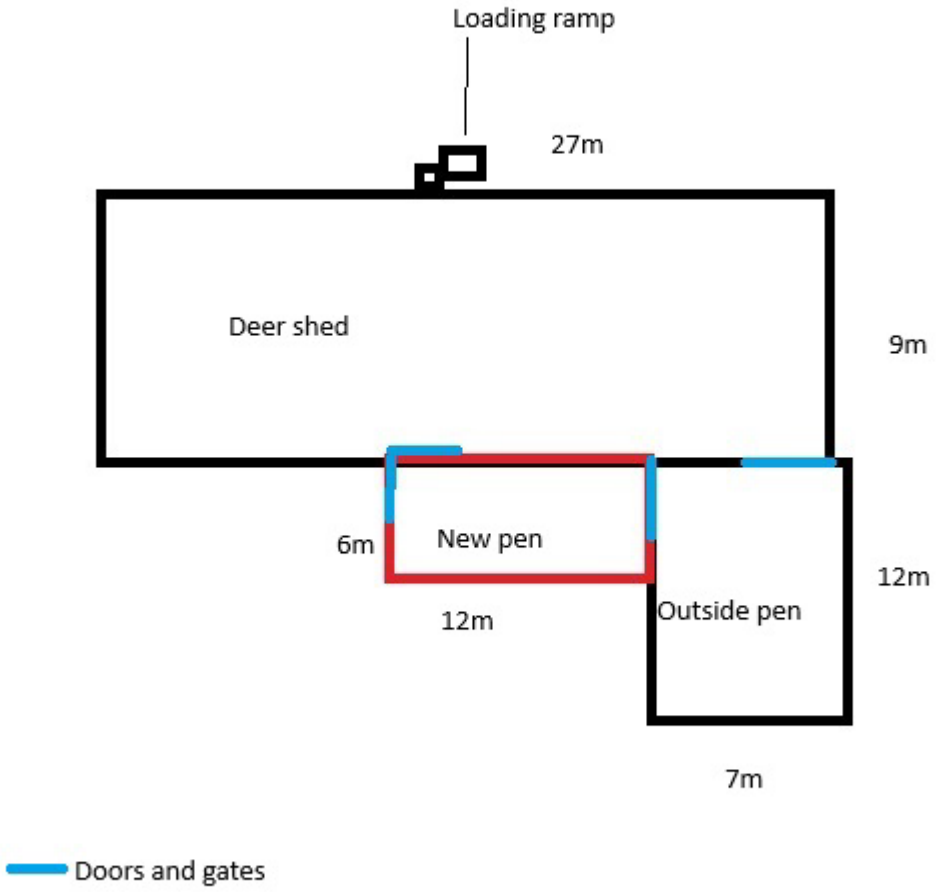
500 x 90% = 450 calves

25% x 500 = 125 calves

450 – 125 = 325 extra calves

325 x 2.5 = 812.5m2 extra shed space

Appendix A14



Appendix A16

Appendix A17

PRESS RELEASE

Property rights pointlessly threatened in Gore

01 October, 2024  Mark Cameron

ACT is backing action by Gore farmers against a Council proposal to designate the entire territory a Site and Area of Significance to Māori.

ACT Rural Communities spokesperson Mark Cameron says:

"As glorious and historic as Gore may be, it's just not credible to say the entire district is a culturally sensitive site. The Council's proposal looks more like a land grab.

"The Treaty of Waitangi settlement process already allows for restoration of land use rights to claimants. There is no need for any council to get ahead of this process by locking up the productive potential of vast swathes of land.

"Section 6 of the Resource Management Act has given local bureaucrats broad powers to run roughshod over property rights. The good news is the Government is in the process of amending, repealing, and replacing the RMA. With ACT in Government, Andrew Hoggard and Simon Court are putting property rights at the centre of new resource management rules.

"This begs the question, why is Gore District Council proposing such a massive change that is likely to be made untenable by new legislation? It's not just a land grab, it's a waste of time, money, and attention."

Press Contact

media@act.org.nz

Appendices for NCA40

Appendix 1

Appendix 2

Appendix 3

Outstanding Coastal Natural Character Area (OCNCA) 40, being the Paparoa Foothills. This is a sequence of rolling to steep coastal hills and valleys, forming the foothills to the Paparoa Range. This is described in Schedule Eight of the Proposed Te Tai o Poutini Plan (TTPP) as follows:

- *Varied amalgam of exposed landforms, very strong elevated relief, windswept vegetation which impart a strong sense of naturalness.*
- *Natural qualities are clearly evident in the landform, vegetation cover and their relationship with the Tasman Sea contributing to a very endemic landscape.*
- *Mature wind swept coastal forest across the escarpment enhances the sense of naturalness and wildness.*
- *The presence of SH6 coastal road does not detract from the highly expressive natural processes and elements which are the dominant feature of the unit.*

Appendix 4

Hi George,

Thanks for touching base yesterday, it was good to catchup with you. As requested, I've had a look at the TTPP requirements for your property this morning, both the online maps and the schedules.

Yes, there is an Outstanding Coastal Natural Character (OCNC) located on your property. This is listed as NCA40. According to Schedule 8 of the TTPP, this area has the following natural character values:

Schedule Eight: Schedule of Outstanding Coastal Natural Character

NCA40 - Paparoa Foothills

- *Sequence of rolling to steep coastal hills and valleys that form the foothills to the Paparoa Range.*
- *Varied amalgam of exposed landforms, very strong elevated relief, windswept vegetation which impart a strong sense of naturalness.*
- *Natural qualities are clearly evident in the landform, vegetation cover and their relationship with the Tasman Sea contributing to a very endemic landscape.*
- *Mature wind swept coastal forest across the escarpment enhances the sense of naturalness and wildness.*
- *The presence of SH6 coastal road does not detract from the highly expressive natural processes and elements which are the dominant feature of the unit.*

One would assume that these values have been drawn from the work associated with the Brown Landscape Study commissioned by the Grey District Council. The study identified Outstanding Landscapes and Natural Features located in areas outside of public conservation lands administered by the Department of Conservation (which are already offered some protection).

Brown delivered the following documents:

- West Coast Landscape Study: Maps, Photos and Schedules, Brown NZ Ltd, May 2013.
- West Coast Landscape and Natural Character Study 2012 and 2013.
- Explanation of Assessment Methodologies, Brown NZ Ltd, March 2021.

- West Coast Landscape Study, Review of Outstanding Natural Landscapes and Areas of High and Outstanding Natural Character, Brown NZ Ltd, March 2022.

Brown also translated Policy 1 of the New Zealand Coastal Policy Statement (NZCPS) into criteria that were meaningful 'on the ground' that he could use to assess the extent of the coastal environment.

As the Brown Study itself is non-ratified, it has little weighting. However, it has likely informed the identification of areas for protection in the TTPP.

An Outstanding Coastal Natural Character (OCNC) area is an overlay spatially identified on the plans (and in this case on your property) as area with distinctive values, risks or other factors which require management in a different manner from the underlying rural zone provisions. Usually in such areas, natural character dominates over human endeavours.

Moving forwards, there are two things worth checking:

1. **That the OCNC area identified, and the values assigned to it are a true and correct representation of the actual landscape.**

As the OCNC area has likely been determined by a desktop study and from views experienced from SH6, it is possible that the extent, contents, maturity, and quality of vegetation have not been fully understood. In addition, from an aerial it can be difficult to ascertain, is it cut over bush or is it mature forest.

Without actually physically visiting the (privately owned and managed) area it is difficult to ascertain what the values are, and therefore what should be preserved or protected.

This is potentially where an assessment from a Landscape Architect would come in, as an independent reviewer. To complete something like this would be in the realm of approximately $10-20K as along with conducting a physical site visit and reviewing the Brown report, other OCNC areas would also need to be considered to see how your area sits alongside them (benchmarking).

2. **What the implications of this area are for you as the landowner.**

My understanding (after a quick review) is that the provisions of the District Plan (rules) etc. related to the OCNC area are limited to within the boundary of the mapped OCNC and should not affect activities being carried out on the remainder of your property.

However, if you wished to conduct an activity, development, shed, fence etc. within the OCNC area itself, there would be rules that would need to be met and one of these would likely be getting a Landscape Assessment from a Landscape Architect. The cost for this would roughly be $15-25K depending on what the application was for.

At a high level, the Council want reassurance that any proposed activity/development would preserve the Outstanding Coastal Natural Character of the area identified on your property.

Moving forwards, it would be worth you and Caryl considering what the chances are of you wanting to utilise/develop this particular area of your property.

If I am planning a trip over to the West Coast, I'll let you know, and we can catch up face to face.

Kind Regards,
Naomi Crawford

Director
BDes (Landscape Architecture) Hons, NZILA Registered
My usual days of work are Monday to Thursday.

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Appendix 5

Department of Conservation
Te Papa Atawhai

File: PAP-11-09

August 24, 2009

George Coates
Nikau Deer Farm
Coast Road
Barrytown Flats
WESTLAND

PROPOSED NHF APPLICATION FOR BURKES RD FARM, PUNAKAIKI-BARRYTOWN FLATS

Dear George

As discussed with you last week, please find enclosed copies of our Buller Area Office Report in relation to your request to consider a portion of land (approximately 6ha) for NHF application on the abovementioned property (SO1790) owned by Nikau Deer Farm.

The attached report summarises our findings following a site visit to the area on 22 July 2009 and gives a *preliminary assessment* of the conservation values. As outlined in the report, both the Department and yourselves have agreed that it is not practical to pursue an NHF application at this time.

A copy of this information has been forwarded to the Conservancy Office for their records so they can note that your query regarding a potential NHF application from earlier this year has now been resolved.

If you have any queries, please do not hesitate to contact the area office on (03) 788 8008.

Yours sincerely

Bob Dickson
Area Manager *Poumanahere*
Pursuant to delegated authority
PO Box 357, Westport 7866, New Zealand
Telephone 03-788 8008, Fax 03-788 8009

Copy: Ron Hazeldine, Community Relations, Concessions, Conservancy Office

Subject:	**Nikau Deer Farm (Coates), Punakaiki-Barrytown Flats (Burkes Rd), proposed NHF Application**
Author:	Kirsty Barr Buller *Kawatiri* Area Office
Copy:	Ron Hazeldine, Community Relations, Concessions – Conservancy Office
Date:	25 August 2009
File:	DOCDM463214

Current Status as at 29/7/09:
Kirsty rang George Coates on 25/7/09 to advise on our area office view (summarised in conclusion) regarding a potential area for NHF application (referred to here as the "potential NHF area") on the Coates' Burke Rd farm in Barrytown Flats/Punakaiki. This followed a site visit and preliminary assessment on 24 July. George asked that our findings be made available to him for their records so a copy of this file note will be forwarded to the Nikau Deer Farm Ltd. Currently the potential NHF area is subject to a consultation process between the Grey District Council and the Coates to decide whether it will be a designated *Significant Natural Area* (SNA). Note that the boundary of the potential NHF area (which includes zones 1, 2 and 3 identified in figure 2) more or less matches the proposed SNA area.

Note there are four parties involved in Nikau Deer Farm Ltd (George and Caryl Coates, John and Beverly Coates). George Coates has been the main point of contact regarding this query, ph 03 731 1805.

1. BACKGROUND:
George Coates contacted the department in February 2009 to advise on the possibility of the potential NHF area (approx 6ha) being put forward for NHF purchase. West Coast Conservancy (Lara Kelson) responded to George on 23 March 2009 to advise that his query had been referred to the Buller Area Office for comment. On 24 July 2009 Chippy Wood and Kirsty Barr met with George, Caryl and John Coates to carry out a preliminary assessment of the landscape, flora, and fauna values.

While the first option was to consider a potential NHF purchase, it was also acknowledged that both the department and the Coates were uncertain whether this was a practical option. In discussing the values of the land in question, George Coates indicated that as a second option he might be interested in developing (hump and hollowing) approx 3ha of this area (refer zone 3 in figure 2) while excluding the higher value areas from development (approx 3 ha, refer zones 1 and 2). The Coates are aware that any development would need prior resource consent approval with the Grey District Council. It was agreed that some kind of assessment of the land would be helpful as this may be needed as part of the SNA process anyway, or in the event of a resource consent application being lodged.

Site Visit – purpose

Attended by: Chippy Wood (Bio-diversity, DOC), Kirsty Barr (Community Relations, DOC), George and Caryl Coates, John Coates (Nikau Deer Farm).
Carried out: 22 July 2009

This **preliminary assessment** was to identify general flora, fauna and landscape values and to advise the Coates whether it would be practical/feasible to pursue an NHF (Nature Heritage Fund) application.

Location:
Refers to private property SO1790 (approx 42.8ha) owned by Nikau Deer Farm Ltd, adjacent to Conservation Area – Barrytown Flat. The potential NHF area is about 7.5 kms to the north of Barrytown and 8kms south of Punakaiki. The land in question is approximately 6ha and lies to the northwestern corner of this freehold block (refer pink boundary in figure 1).

Figure 1: Aerial map showing Nikau Deer Farm's freehold block (outlined in yellow) at Barrytown/Punakaiki Flats with potential NHF area outlined in pink (note that this boundary roughly correlates to the proposed SNA currently under negotiation). Also shown is adjacent conservation area (green), and neighbouring block on northern boundary, soon to be under DOC management.

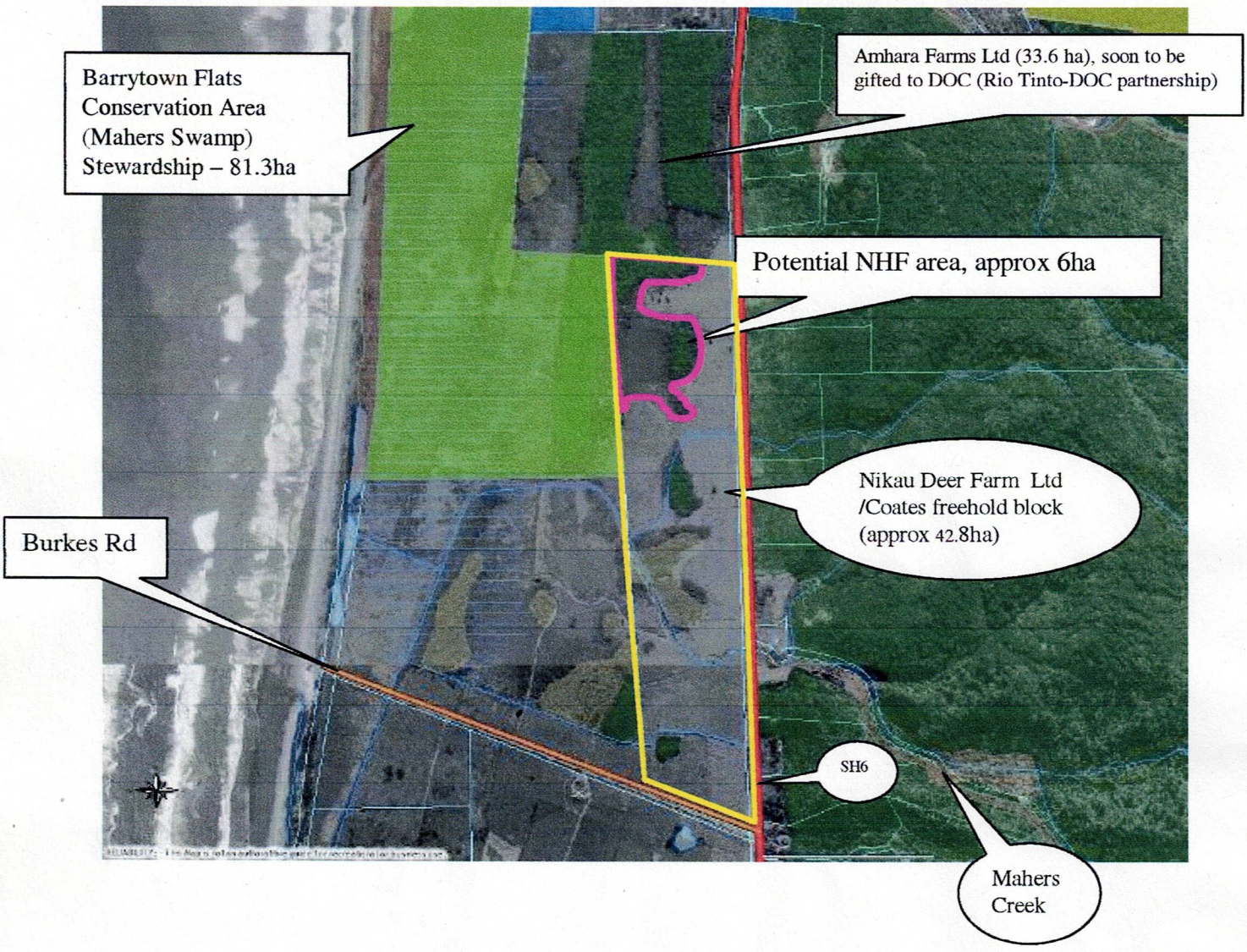
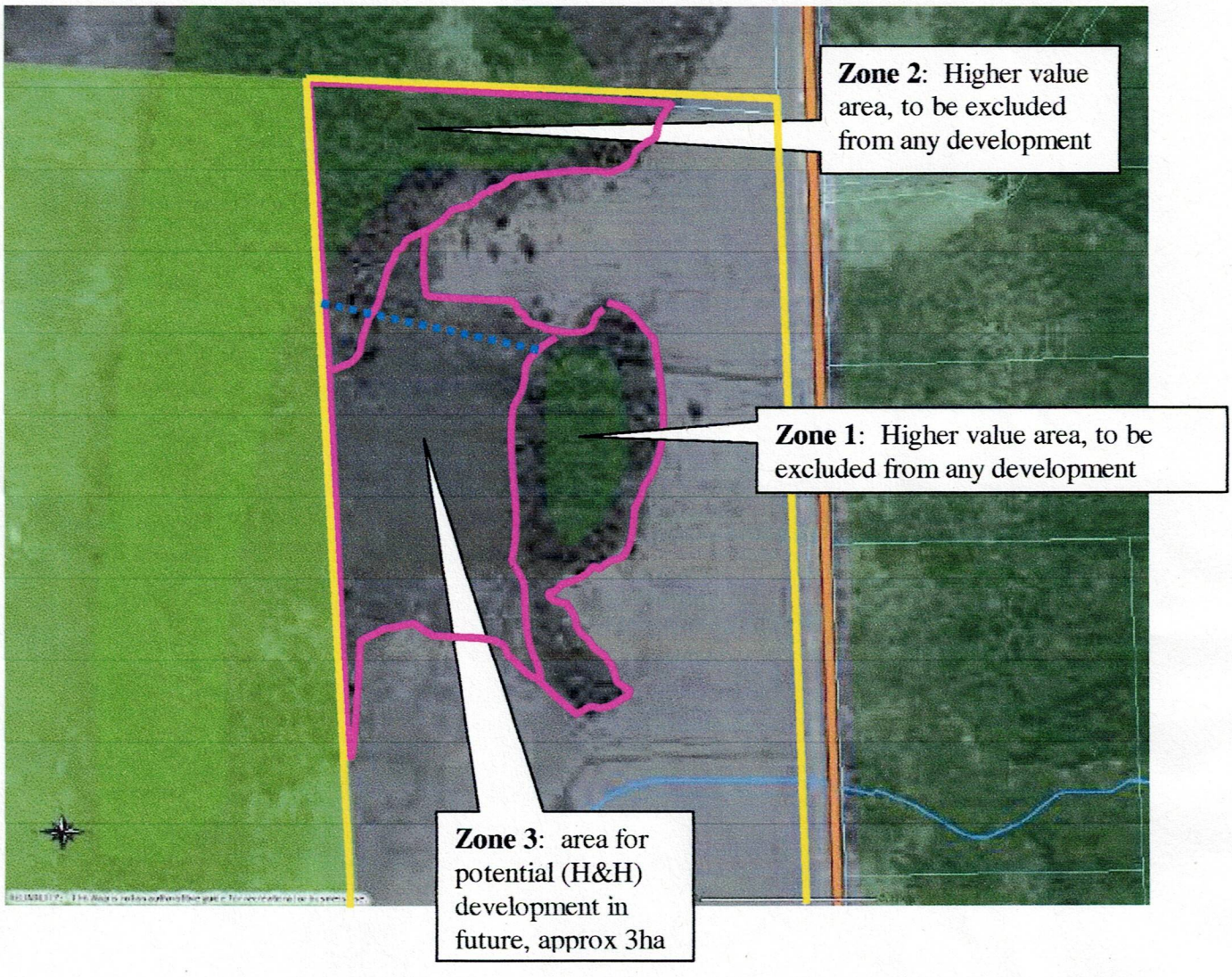


Figure 2: Aerial map showing 3 different 'zones' outlined in pink within potential NHF area on Nikau Deer Farm's freehold block (outlined in yellow), approximate course of drain/waterway is in blue dots (also refer to photo 4). Note that zones 1, 2, 3 here are currently subject to a proposed SNA (under negotiation).

Note that the lines showing boundaries and drain/waterway position are approximate. Zones 1 and 2 (combined) are about 3ha.



2. VALUES

General:

The land lies on the Barrytown flats coastal plain which consists of a series of uplifted beach ridges and associated troughs, sand dune terraces, and marine gravels which are overlaid with sand and topsoil. The area has a mix of wetland and pasture land which has been significantly modified over the 20th century as a result of farming, logging and mining activities. The area has a farming history which dates back to post WWI, and logging would have been carried out during the early part of the 20th century (pers. Comm.. John Coates).

At the second level of the LENZ classification system the entire site is an M1 environment (Leathwick, 2003). This environment typically contains vegetation characterized by kahikatea forest, and fertile flax-carex swamps. Characteristic native fauna of an M1 environment are kereru, bellbird, tui, fernbird, bittern, tomtit, brown mudfish, and giant kokopuwhile kotuku, bittern, giant kokopu, fertile swamps, and *Myriophyllum robustum* are characteristic pressure sensitive species On the West Coast 38% of environment M1 is protected as public conservation land (but may increasesoon given land to be gifted to DOC) and 42% of M1 land is in native cover. Zones 1 and 2 (which together make up approximately 3ha) contain regenerating podocarp forest that is approximately 80 yrs old. Zone 3 is much wetter underfoot and has been recently grazed. At level four of the LENZ classification system, the siteis M1.1a. On the west coast region 33% of environment M1.1a is protected as public conservation land and 36% is in native cover)

Note that at the time of our site visit, it had been recently raining andthere had been days of moderate rainfall prior to this.

Zones 1 and 2:

The Coates advise that regardless of any formal protective designations such as an SNA, this area would be excluded from any potential development (eg hump and hollowing). These zones contain forested area of regenerating kahikatea (dominant and up to 20m), with some stands of matai (it was noted that very occasional matai have been recently logged). Also noted were flora such as bush lawyer, Toru, Kamahi (up to 10m), Rimu (up to 20m), Supplejack, Astelias, Crown fern, *Cyathodes juniperina*, (mingimingi),*Gahnia* (native grass), Ponga (mamaku and Wheki), *Parsonsia capsularis* (jasmine). Non native weeds include *Lotus major*. The ground was relatively wet underfoot.

Zone 3:

This is the area that the Coates may consider for hump and hollowing It is much wetter under foot and flax is dominant. The ground is quite severely grazed in parts, pugged and rain drains from a nearby paddock from the northeast. Other flora present include *Cordyline australis* (cabbage tree) small rimu, ponga, occasional lancewood(horoeka), marble leaf, toru, wineberry and kamahi. A variety of coprosmas are throughout, as is lotus major. There are some stands of more mature forest (see photos 3,6,7). The Coates advise that where there are several of these together or any markedly older trees present, these would be left intact. Weeds in this zone include blackberry, gorse, and lotus major.

Fauna throughout:

There are number of endangered bird species that use the area. Fernbirds are common in Maher Swamp (Chippie Wood biodiversity ranger) These birds are an endangered species listed as sparse (Hitchmough, 2002). Western weka also inhabit the area, and are classified as endangered species in serious decline (Hitchmough, 2002). A number of Westland petrel colonies lie in the low forested hills east of the State Highway and are bounded by the Punakaiki River in the north and Lawson

Creek in the south. No parts of these colonies lie within the immediate vicinity of the potential NHF area. Westland Black Petrels are an endangered species classified as range restricted (Hitchmough, 2002).

Surveys in 2005 found some little blue penguins using Pakiroa Beach (Blyth et al 2006). These sightings were mostly at the northern end of the beach, where "many footprints were found" (p.12). This is approximately 4kms away. Although there are records for penguins being present in the central areas of Pakiroa Beach, there is a buffer between the sea and farmland (Barrytown Flats Conservation Area - Mahers Swamp) and blue penguins are unlikely to be in the immediate vicinity These birds are classified as an endangered species in gradual decline (Hitchmough, 2002).

Good numbers of forest bird species (e.g., kereru, bellbird, tui etc) use the forested portions of all the blocks seasonally. Although not heard at the time of the site visit, fernbird will almost certainly be present. Other avifauna identified as being present included bellbird, pukeko, weka, fantails, paradise ducks and blackbirds. It is possible that other wetland bird such as bittern may be present, although the Coates don't report seeing any and none were identified at the time of the site visit.

Freshwater values:
A drain/waterway is present through the northern section of zone 3 and runs through all zones (refer blue line in figure 2 and photo 4). This was built by the Langridges approximately 50 yrs ago (pers. Comm.. J Coates). The drain/waterway is on the edge of the area that would be potentially developed and would not be fenced. The vegetation around the drain/waterway would probably be cleared (pers. Comm. George Coates). If this zone is developed in future, the Coates will need to comply with any riparian margin requirements (if applicable) as defined by the consenting authority. If none is required however, it may be possible to advocate with the Coates to retain grasses and other plants along the drain edge that may help with filtering of water (and therefore protect freshwater values) downstream.

Historical/Recreational and scenic values:
There are no historic sites noted on DOC historic maps for the freehold block relating to this potential NHF area. However an archaeological site was noted to be on the freehold block approximately 400m south of the potential NHF area's southern boundary (ref K30/79). However Jackie Breen (Technical Support Officer, Historic) advised that this site was incorrectly positioned on the GIS system and was in fact located on the adjacent property south of Barrytown Flats Conservation Area (Mahers Swamp) in a neighbouring land owned by Punakaiki Downs Ltd. This site is noted on the GIS system as being related to "gold mining" and Jackie further described this as being a "curvilinear depression, up to 60cm wide, 40 cm deep, running for 10m before fading out. Its condition is described as being "poor" (pers. Comm. J Breen).

The area under question is on private property and as such there is no public access to or through this land. Between this block and Pakiroa Beach to the west is Barrytown Flats Conservation Area (Mahers Swamp) and public access to the beach is easily gained via Burkes Rd to the south.

The potential NHF area is visible from the main road (SH6 Coast Rd) which is approximately 130m away. The surrounding area has a mixture of rural development (farming and residential housing) along with national park/scenic reserve. To the south is a rural-residential subdivision and on the farm itself there is currently grazing. Any potential hump and hollowing activity on the 3ha site would be in general keeping with other activities and development in the area. If zone 3 was developed, it would be difficult to see from the road due to the forested portions found in zones 1 and 2 which would shield it from view

3. LAND STATUS/PROTECTION:

Surrounding land under DOC management:
In discussing land status issues with the Coates, JohnCoates pointed out there is already a lot of land under DOC managementin this area. Immediately to the west of the potential NHF area is Barrytown Flats Conservation Area (Mahers Swamp) which has stewardship status, and is approximately 81.3ha. To the east is the Paparoa Range South conservation area (stewardship) and further east is the Paparoa National Park. Added to this, are the recent land acquisitions from the Rio Tinto-DOC partnership, which in the near future will also includethe 33.6 ha block directly to the north. There are QEII covenants nearby, and numerous proposed SNAs currently under consideration.

During the site visit we were able to concludethat the surrounding areas under DOC management probably provided *better representation* and *higher values* compared to the potential NHF area that was the subject of this assessment. This is not to say that the area under question is not of high value, and certainly zones 1 and 2 are a good representation of 80yrold regenerating coastal kahikatea forest. However there was agreement that in terms of intactness, bio-diversity and stage of regeneration, there were better examples nearby that were already protected (or soon would be) under DOC management.

Covenants:
George Coates indicated he would not currently be keen to covenant or formalise protection over zones 1 and 2, even though there is no intention to develop these areas. His position (which may or may not be different from other members of Nikau Deer Farm Ltd) is based on the view that these areas are under private ownership, and their use should be under the management of the landowner and not subject to public covenants.

SNAs:
As stated above, the potential SNA status of this area is still being discussedby Grey District Council and the landowner. The Department may be called upon to comment on the values for this area or to have input into the final decision. The presence of an SNA designation will mean the district council will be involvedif or when a resource consent application is lodged and it is likely the Department would also be involved as an affected party. The SNA status will be an important factor for consideration for any consenting authority regarding potential development.

NHF Process
In discussing the NHF Application process with Ron Hazeldine (CR Officer, Concessions, Conservancy Office), I was advised that the NHF meet 3-4 times a year (often less) to discuss potential applications. Only outstanding orremarkable examples are likelyto be in the running. In discussing this case with Ron, it was agreed that this particular site (while still high value in parts) could not be described as being *outstanding* or *remarkable*, especially in the context of the more intact and higher value land that exists under DOC management in the immediatevicinity.

The Coates have already been through an NHF process and are aware of the timelinesinvolved. Generally, it would take approximately8-10 months (at best) for an application to be processed to the point where the applicant is confident ofthe outcome. Given the Coates want to have a decision by the end of this year so they can plan futuredevelopment on their farms generally,this timeline is not practical.

4. CONCLUSION:

In conclusion, the department carried out a preliminary assessment of values in the potential NHF area which would help inform both the applicant and the department in terms of a possible application as well as provide information should a resource consent application be lodged in future. This area is currently subject to ongoing consultation between the Grey District Council and the applicant regarding potential SNA status. The landowners (Nikau Deer Farm Ltd) advised that if an NHF application was not practical, then it may consider lodging a resource consent application to develop (hump and hollow) part of this area - identified as zone 3 - while leaving areas (zones 1 and 2) intact.

Regarding values for the potential NHF area, the surrounding area has been subject to significant modification over the last century through farming, logging and mining. Zones 1 and 2 (to be excluded from development) can be described as being 80yr old regenerating kahikatea podocarp coastal forest, while zone 3 is characterized as being flax dominated, wet underfoot with some more recently regenerating forest. Zones 1 and 2 are distinct in that they represent higher flora values while zone 3 has been recently grazed, and quite severely, in parts.

In considering whether the land in question is worth pursuing as an NHF application it was concluded that overall the values in this area could not be considered to be *outstanding or remarkable* when compared to other land nearby. While it does contain high values, there are better examples in neighbouring land managed by the department that are currently under protection (and more land will soon be gifted to DOC). In the wider area there is land with scenic reserve, nature reserve and national park status. Therefore it was agreed that any application was likely to be unsuccessful. This was the view of the Coates (and an NHF application needs to be applicant led) as well as the view of departmental staff.

While any resource consent application would need to be considered if and when an application is lodged, this preliminary assessment indicates that development of the 3ha area under question would probably pose minimal risk in relation to values in this area. However, some protection over zones 1 and 2 would be desirable, although the final decision regarding this would rest with the consenting authority. If maintaining a riparian along the drain/waterway is outside the scope of a resource consent process (or is not required under the district plan), there may be an opportunity to discuss with the Coates the possibility of retaining grasses and other plants along the drain edge that can help with filtering of water (and therefore protect freshwater values) downstream towards Mahers Creek.

5. RECOMMENDATION:

It is recommended that based on the information above, the potential NHF area is *not put forward* as an NHF application at this time. This is confirmed as being the view of both the department and the Coates.

It is recommended that if a resource consent application is lodged and the department is deemed to be an affected party, that this report will contribute to (but not necessarily determine) a decision regarding the department's approval as an affected party.

Reporting Officer: Kirsty Barr Date: 25 August 2009

Please indicate your decision below and sign the attached correspondence

2. **Decision**

Approve/ ~~Decline~~/ Request more information

Area Manager _____ Date 27-8-09