

**Submission on Proposed Timaru District Plan - He Po. He Ao. Ka Awatea.**

**Form 5 Submission on publically notified proposal for policy statement or plan, change or variation**

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Timaru District Council - Planning Unit

**Date received:** 25/11/2022

**Submission Reference Number #:**4

This is a submission on the following proposed plan (the **proposal**): Proposed Timaru District Plan - He Po. He Ao. Ka Awatea.

**Address for service:**

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**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

**Submission points**

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**Point 4.1**

**Section:** SCHED6 – Schedule of Sites and Areas of Significance to Kati Huirapa

**Sub-section:** SCHED6E – Wai tapu areas

**Provision:**

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SASM17

Awarua Stream

This awa, with associated springs and wetlands, is in close proximity to the Arowhenua marae and papakāika, and has historically provided an important source of high quality water.

**Sentiment:** Amend

**Submission:**

We aim to farm in the most sustainable way we can so that the land can be left for future generations in a better position than when we started. We have been farming cattle for over 30 years in the area and this is the first time we have ever heard this waterway referred to as the Awawru Stream. The waterway referred to as the Awarua Stream (SASM-17) is an ephemeral water way that only has water in it when it is raining. The rest of the year the stream is dry and has plants growing all the way through it. This can be corroborated by looking back at historical photos over the last 50 years (canterburymaps.govt.nz and retrolens.co.nz) which show the stream is dry. Therefore, it is hard to imagine the Awarua stream was a good source of high-quality water if the only time it ever had water was when it was flooding. Especially as the marae is positioned between the Opihi and Temuka rivers which would have provided far more reliable sources of water. Without further information it raises concerns about the accuracy of the mapping and why this ephemeral waterway is significant.

**Relief sought**

While we believe it may be reasonable to apply these provisions to the springs and swamp land immediately around the marae, we do not believe it is fair nor reasonable to apply the same constraints to the whole Awarua Stream as it is an ephemeral waterway that only contains water when it is flooding. We therefore believe the rules and provisions should be removed from the majority of the Awarua Stream, especially as many of the concerns raised around management of these areas are already covered by provisions within ECANs existing consent requirements.

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**Point 4.2**

**Section:** SASM – Sites and Areas of Significance to Maori

**Sub-section:** Rules

**Provision:**

SASM-R6 [Intensively farmed stock](#)

**Sentiment:** Oppose

**Submission:**

We have been farming cattle for over 30 years in the area. We strive to do this in the most sustainable way we can so that the land can be left for future generations in a better position than when we started. We are constantly looking at improving what we do to ensure we can look after the biodiversity already present and are always looking at ways to add to what is there. For example, we have been doing this by planting a significant number of native plantings and excluding stock from those areas that are special to us. We therefore believe we are already managing these areas in a sustainable manner and requiring us to apply for additional consents to change what we do each year will result in a significant increase in both time and costs. Applying for a consent is no simple feat and often requires a lot of work by consultants to achieve the desired outcome. This adds a lot of extra cost to any consent application that needs to be taken into account by decision makers.

**Relief sought**

We believe the provisions related to insensitively grazed animals should be removed from all areas as they are already covered by ECAN and the provisions in the consents they require farmers to hold to farm. Requiring another consent from the Timaru District Council would result in a duplication of time and money for no material gain. This adds significant costs to the whole process and delays farmers the opportunity to be nimble in their decision making as it slows down the whole process. It also adds to the increased stress of farmers as it adds a whole new layer of rules and oversight that needs to be complied with. We do not believe this is fair and reasonable when mental stress is already a very significant issue for the rural community.

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**Point 4.3**

**Section:** SCHED6 – Schedule of Sites and Areas of Significance to Kati Huirapa

**Sub-section:** SCHED6B – Wahi taoka areas

**Provision:**

SASM7	Kākahu basin and foothills	This is one of the few remaining areas of ngahere in the district. Values include <a href="#">mahika kai</a> , <a href="#">taoka</a> species, <a href="#">ara tawhito</a> , harvest of materials, trading, ngahere, <a href="#">Kā tuhituhi o neherā</a> .
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**Sentiment:** Amend

**Submission:**

We aim to farm in the most sustainable way we can so that the land can be left for future generations in a better position than when we started. We have been farming cattle for over 30 years in the area and we have never heard our farms referred to as Kakahu basin and foothills. Our land runs along the Opuha and Opihi rivers and all creeks and streams flow into these rivers. There are no streams that flow from our lands into the Kakahu river or the Kakahu basin which is downstream of the Kakahu river. The SASM-7 area includes a diverse range of farmland and the eastern boundary often forms no resemblance to any natural features on the ground. For example, it crosses our land at 716 Main Waitohi Road and goes straight across this flat area. It follows no natural features. This raises concerns about the accuracy of the mapping. Furthermore, there is only a brief definition as to why these areas are significant. It is impossible for us as caretakers of the land to protect something that we do not know what we are protecting or where it is.

We are constantly looking at improving what we do to ensure we can look after the biodiversity already present and are always looking at ways to add to what is there. For example, we have been doing this by planting a significant number of native plantings and excluding stock from those areas that are special to us. We therefore believe we are already managing these areas in a sustainable manner and requiring us to apply for additional consents to change what we do each year will result in a significant increase in both time and costs. Applying for a consent is no simple feat and often requires a lot of work by consultants to achieve the desired outcome. This adds a lot of extra cost to any consent application that needs to be taken into account by decision makers.

**Relief sought**

We request further information is provided as to what is specifically significant within these areas and then adjust the areas to more accurately reflect these sites. The provisions applied to these areas should then reflect the varying level of significance of each area. Consideration must be taken for the fact many of these provisions are already covered by existing provisions within ECAN's consents. Requiring another consent from the Timaru District Council would result in a duplication of time and money for no material gain. This adds significant costs to the whole process and delays farmers the opportunity to be nimble in their decision making as it slows down the whole process. It also adds to the increased stress of farmers as it adds a whole new layer of rules and oversight that needs to be complied with. We do not believe this is fair and reasonable when mental stress is already a very significant issue for the rural community.

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**Point 4.4**

**Section:** SCHED6 – Schedule of Sites and Areas of Significance to Kati Huirapa

**Sub-section:** SCHED6C - WAHI tapu areas

**Provision:**

SASM9	Ōpihi rock art sites	Significant complex of <a href="#">Kā tuhituhi o neherā</a> .
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**Sentiment:** Amend

**Submission:**

One of our properties is on the Winchester Hanging Rock road, just beside the Hanging Rock Bridge (ID: 13426, 79383). We are aware of only one set of rock drawings on this block and they have been fenced off for well over 30 years. We totally agree this is a special site and needs to be protected which is why it has been fenced off and trees were not planted close to the site. However, the map appears to show more than one rock drawing site on this land which we are not aware of. If we do not know about these sites then we are not able to protect them to the best of our abilities.

**Relief sought**

We request that additional information is provided as to the locations of these other rock drawings. If no further information can be provided, we believe it is only fair and reasonable that the significant area and associated provisions are restricted to the immediate area surrounding the rock drawings themselves.