



Tena koutou katoa Ko Eleonora Sparagna toku ingoa. Our family owns 43 hectares of rural land on Southernthread Road past the Brooklyn wind turbine. Our lot used to be part of Long Gully Station until we purchased it approximately 7 years ago.

**We vehemently oppose SNAs being imposed on private rural land.** This is contrary to the current Resource Management Act (RMA) intention as well as the upcoming changes the new Government will shortly introduce – as signalled by the Prime Minister as well as others already mentioned.

It is a complete waste of money and resources and it creates massive stress and financial burden for rural landowners that are already under resourced.

The current purpose of the RMA is first and foremost to:

*‘promote the **sustainable management** of natural and physical resources (Part 2 Purpose and Principles)’.*

*The Act also states:*

*‘In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*

*(a)*

*sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*

*(b)*

*safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*

*(c)*

*avoiding, remedying, or mitigating any adverse effects of activities on the environment.’*

It is in only to support achieving the above purpose that Councils should *‘recognise and provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna’* as a matter of national importance.

The restrictive and punitive way in which Wellington Council has interpreted ‘matter of national significance’ and implemented the SNAs on privately owned rural land is contrary to the purpose of the Act: it has been done in a way and at a rate that stops (not enables) us to provide for our social, economic, and cultural well-being and for our health and safety.

It has created an artificial distinction of convenience between city and rural areas, stopping mutually beneficial social cohesion and collaboration.

It has created massive negative economic impacts for private landowners, through a layer of complexity, compliance and cost as RC are now forcibly required even for permitted rural activities (that are already regulated both by WCC and the Regional authority, and national guidelines rules and regulations). And it also has meant land value and capital potential is dramatically diminished. To give you a sense of scale of the economic impacts of an SNA, major banks do not allow carbon credits on mortgaged properties because they prevent development over time, and the SNAs are massively more restrictive.

The way WCC has implemented the SNAs also does nothing to actually safeguard our ecosystem or mitigate the adverse effects of activities on the environment:

- We cannot create, manage and maintain even small pedestrian tracks to support non-toxic pest control and trapping.
- We cannot create, maintain or upgrade farm access tracks that support the use of machinery where it is not possible to do otherwise, for example due to the scale of the job, size of the property or land contours considerations.
- We cannot clear external wall or roof of a building, including farm accessory buildings, to allow the safe use of farm machinery, farm accessory equipment and similar in support of permitted activities, including agricultural, pastoral or horticultural, and to meet health and safety practices.
- We cannot manage, maintain and improve flood protection and natural hazard controls, include responding to weather events caused by climate change.
- We cannot fence to protect natives, and the list of what now requires an RC and Council’s officials approval goes on.

WCC has turned the good intentions of the RMA and its supporters into an opportunity to secure and capitalise on the good work of private rural land owners effectively seizing control of their land (that they paid for) when they as a Council have failed to do anything to avoid, remedy, or mitigate any adverse effects of their own activities on the environment.

On the contrary WCC has systematically removed all vegetation from the city streets to make way for cycleways; and has failed to do the most basic form of weeds control on its own land, spending millions of dollars on speed bumps instead.

And more RC is good news for a cash strapped Council, seeing how zealous its officials have been on this front, officials that come over on site visits and spend days writing emails to rural landowners to justify their existence.

I challenge you to be able to identify a pedestrian path through the bush to do trapping on our property to justify this level of scrutiny and compliance, from the only spot in Karori where our land is even visible from:



We have spent days/weeks and months chasing Council's increasingly disconnected requests, and thousand and thousands of dollars - over 30K this year alone. And all that time and resources have not gone in protecting and planting natives, fencing and pest control, soil improvement or the beehives or farm stock.

Rural owners that have tried to argue the insanity and uselessness of those Council's officials requests have either been dismissed or targeted and bullied into submissions with even more detailed requests, threats of fines, forced removals and legal action.

We tried our best to engage in the SNAs consultation, made submission, met with the people that were willing to listen and yet in the end we are left to deal with Council's officials who literally make a living by sending email requests on a whim, without any checks and balances; and who justify their existence from a desktop by telling rural owners what to do with their own land, with no idea of what they are even talking about.

Council should not be able to freeze private land as their own natural parks, noting we are not even allowed to have anyone come and enjoy them as no secondary dwellings, farm stays or any kind of tiny home is allowed.

Stop harassing private rural landowners, and having a bunch of Council's officials spend their time and resources on useless witch hunts. Get those Council's officials to work on what the city needs to do with its own public resources: public parks and green spaces, infrastructure, tourism, growing businesses, planting public spaces and working for the climate resilience of the city.

Support rural landowners: remove the current SNAs then start again with an empowering framework. Give rural landowners permission to do what they do best and care for their own properties the way they already know how to, and let them create social and economic value for everyone. It will cost you nothing and will provide benefits for all.

And if you have money to spend for the sustainable management of natural resources, give it to rural landowners; they have done great with little and will do amazingly if they were properly funded to do what they love and continue to care for their land.

Rural property owners have a right to utilise, maintain and enjoy their freehold land; same as people living in Wellington city for whom the SNAs were in the end not approved.

**What we seek from the commissioners of this hearing is to totally remove all SNA's from private rural land unless that private landowner consents to its overlay.**