Matt O'Regan, 19 June 2018 BLUP050 Oweka

I Request this area to be removed from the Wetlands schedule. (Boundaries removed completely) I do not accept that the area referred to as BLUP050 Oweka should be included in the list of Schedule 2 SNAs and request that the council removes it from the list.

Reasons:

- 1) The original process of determining these areas was improper as it did not involve any consultation with the owner of the land, this is a serious breach of freehold property rights.
- 2) There was no work completed that determined whether the land referred to as BLUP050 was well represented in other areas, it is improper to leave the cost of determining this (for the good of the nation) with the owner of the property.
- 3) This area has been offered to the Department of Conservation in the past. Once to purchase through the heritage trust and a second time as part of a land swap. It can hardly be said to have SNA status as neither of these opportunities were taken up by DOC
- 4) There has been no economic assessment done of having this area included as an SNA.
- 5) The Buller District Council already requires land owners to apply for a resource consent for vegetation clearance, this process would identify areas of significance. What the WCRC is requiring is a double-up of requirements and totally unnecessary.
- 6) 87% of our region is already in DOC estate, (an area of the size of the Waikato province) our region cannot afford to have more land restricted from development

Economic cost to the owner of this land being included as an SNA;

The last resource consent I applied for, for vegetation clearance, cost over \$20,000, this is an upfront cost with no guarantee of being able to develop the land. This is a disincentive to land-development.

This area of 20 hectares boundaries our dairy farm and if developed would add significant economic value to the property both in asset value and profit.

The area as it is, has a value from \$0 to possibly \$400 per ha, I could develop this into dairy pasture for \$10,000 per hectare, it would then have a asset value of \$22000 to \$28,000 per hectare depending on the market. It would generate \$6000 of income per annum at a \$6 per milksolid payout. The fixed costs of my business are already accrued in the effective area of my existing dairy farm so the profit per hectare from this land being developed would be less the interest cost on the development expenditure and the maintenance cost of maintaining the land and a small increase in farm working expenditure, leaving a profit per hectare of approximately \$4000 per annum. Twenty hectares X\$4000 = \$80,000 per year, being able to develop this land makes a huge difference to the profitability of our business.

The economic cost to the region of this land being included as an SNA;

The milk produced from this land would generate income at Westland Milk products of approximately \$200,000 dollars per annum, \$120,000 of this would go to the milk producer leaving \$80000 dollars of benefit to Westland Milk Products and the region every year. Rates payable on this land would go from approximately \$200 to \$1400 per year. This is the annual economic benefit of developing twenty hectares, the cost of restricting the use of private property development is something our region cannot afford.

If this land is to remain a Schedule 2 SNA then I request the following:

The council completes an assessment of the area to determine its significance, using experts that are acceptable to the owner. If the area meets the criteria, then the following should be implemented;

- 1) Compensation be paid to the land owner for the devaluation of the property and the loss of potential profits that this area would generate.
- 2) Or, a land swap of land that would generate the same income be arranged by the council.
- 3) Rates would not be payable on SNAs by the owner of the property but paid by central government.
- 4) Weed and pest control would be completed annually by either the Regional Council or DOC
- 5) The owners bank to be advised by the council of the financial effects of this land being included as a Schedule 2 Wetland and why it is necessary that the owner be deprived of the economic value of the SNA area.