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Councillors  
Hutt City District Council  
30 Laings Road  
**Lower Hutt**

**By Email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)**

Tēnā koutou

**Re: Submission on Hutt City District Plan**  
**Orongorongo Station – 1960 Coast Road**

1. This is a written submission on the proposed Hutt City District Plan, made on behalf of Orongorongo Station, the owners of the property at 1960 Coast Road.
2. Orongorongo Station wish to be heard on this submission.
3. The Station gains no advantage by way of trade competition based on this submission.
4. The address for service for Orongorongo Station is the writer, legal counsel Leo Watson at the contact details at the top of this letter.
5. In summary:
  - (a) Orongorongo Station is a major landowner in the district, and welcomes the increased planning protection for areas which meet the threshold of outstanding natural and coastal landscapes, and the protection of wāhi tapu and other areas of cultural significance to hapū and iwi;
  - (b) However, Orongorongo Station will be significantly impacted by some of the proposed Outstanding Natural Landscape and Coastal areas to be applied to the Station. The Station seeks an amendment to certain areas to exempt parts of the Station which do not meet the ONL and coastal requirements and which will otherwise cause them prejudice;
  - (c) Orongorongo Station have been consistent in their position taken on the proposed areas, and have engaged constructively with Boffa Miskell and

other Council advisors to provide reasons for their position. Regrettably, it appears that the relevant considerations applicable to the Orongorongo Station situation have been properly taken into account;

- (d) Orongorongo Station wish to be treated fairly and equitably, in relation to other landowners. Orongorongo Station has an example on the Coast Road where exemptions have been agreed, in circumstances similar to those facing Orongorongo Station. Orongorongo Station wants the same approach applied to them;
  - (e) Orongorongo Station supports the protection of sites of significance to mana whenua, and wishes to have engagement with hapū and iwi to ensure that classification is appropriate and meets the needs of all parties;
  - (f) In addition, Orongorongo Station is a member of Federated Farmers, and has read the Federated Farmers submission and supports it. Therefore Orongorongo Station requests that this submission be read in conjunction with the Federated Farmers submission, as it relates to the Station land.
6. The Station has marked up on a **supporting map** to show the various overlay areas which are proposed and which impact on the Station as a whole.
    - (a) The property boundaries are marked in red;
    - (b) The current area of significance to Māori is shown in dark black;
    - (c) The current proposed ONL and coastal areas which impact on the Station are shown with a “X” in a circle;
    - (d) The areas which the Station submit might be exempted from the protections are shown in yellow hatch with an “X”.
  7. The map shows the areas where the Station requests that exemptions be applied. Of the approximately 6000 acres of farmland, about 5750 acres are the subject of some form of Council environmental restriction.
  8. For the most part, the Station accepts the proposed overlays and will work positively with the Council to uphold the outstanding features of the environment and landscape. There has also been some exempted areas carved out of the ONL categorisation (for instance around the farm homestead). However, in relation to some other areas of the Station land, the owners request an exemption from the ONL categorisation, given that (1) the areas do not meet the threshold requirements of ONL but appear to have been lumped together with adjacent areas of land that do meet the criteria and (2) the inclusion in the ONL categorisation of those areas will be disproportionately prejudicial to the Station.
  9. These are areas which are predominantly grass lands and form the backbone of the Station’s economic sustainability. Orongorongo Station is a family owned farm, which supports three families over three generations. The Clarke family has owned the farm for over 40 years, and have taken deliberate and strategic steps over the past 25 years to allow native vegetation to regenerate over much of the farm, and have an aspiration to move from livestock farming into eco-tourism

ventures which celebrate and share with others the environmental features of the land. The Station also wishes to have the area historically used as a farm and guest lodge to be exempt, it already has a degree of modification to the environment that has been permitted.

10. Aspirations such as the construction of small glamping huts, or walking/cycling tracks are likely to be hampered by the extent of the ONL categorisation, because (for example) building is restricted to 10 square metres per year. This is despite the fact that the proposals would involve minimal earthworks, and be internal within the farm itself and have very low visual impact on the coastline. Furthermore, it is likely that compliance with resource consent requirements will result in high professional advice costs and time/cost inefficiencies. Even at a practical level, the Station will need to be able to undertake track maintenance in the event of weather events, clearing slip material, and using that material on existing farm tracks (as opposed to the current practice of carting slip material to the city landfills).
11. In engagement with Council advisors, the mapping experts have advised the Station that they do not wish to carve out smaller areas of land from bigger categorised landscapes. However, the Station is aware of where this has occurred in other coastal properties, such as at Camp Wainui, Eastbourne, Jackson's, and Pencarrow. A more specific and localised approach is appropriate and justifiable to meet the needs of all parties.
12. In terms of the proposed areas of protection for Māori cultural significance, Orongorongo Station supports the proposals, and continues to have a constructive relationship with adjacent Māori landowners and members of the hapū and iwi that hold mana whenua, particularly in terms of access to kaimoana gathering areas.
13. A HCC plan showing the Māori area of significance that impacts on the Station is set out below. The Station notes that the current classification is at a higher level of protection than might be needed, because the mapping seems to have been by way of a Council "catch all" approach. Rather, the Station believes that with constructive engagement with mana whenua, a more suitable and nuanced approach to classification can be achieved, with some of the area potentially not requiring such high protection. To date, there has unfortunately been no opportunity for affected landowners to have consultation with mana whenua, to enable a rational discussion as to the needs of the different parties, because the HCC's advisors had notified the proposed area of Māori protection only after it had conducted consultation with landowners on the coastal and landscape features in the proposed Plan.



14. The Station looks forward to sensible and rational engagement in a way that will meet the needs of all affected parties.

Noho ora mai

**Leo Watson**

Attachments: Supporting Map showing Orongorongo Station  
 Other References: Federated Farmer's submission on proposed Plan





- = Orongorongo Station Boundaries
- = Proposed Māori significance area
- Ⓢ = Requested Exemption Areas
- ⊗ = Current Proposed HCC ONL Areas

