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**SUBMISSION OF THE WOLDS STATION LIMITED (THE WOLDS)  
ON PLAN CHANGE 24, TO THE MACKENZIE DISTRICT PLAN**

**26 January 2024**

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To Mackenzie District Council

This is a submission on proposed Plan Change 24 (**PC24**) – Sites and Areas of Significance to Māori (**SASM**) to the Mackenzie District Plan (**MDP**).

- 1 The Wolds Station is located 18km south of Lake Tekapo. We are the second and third generations of farmers on The Wolds Station, and fourth and fifth generations in the Murray family to farm in the Mackenzie Basin.
- 2 The Wolds consistently participates in district, regional, and higher-level planning processes. The Wolds is passionate about protecting identified significant environmental values within the Mackenzie Basin, alongside providing for the ongoing viability of The Wolds farm operation and the wider rural farming community; both which contribute to the values of the Mackenzie Basin.
- 3 The specific provisions of PC24 that this submission relates to, and The Wolds position in relation to the same, are identified in the attached table.
- 4 The Wolds general comments are as follows:
  - 4.1 As part of tenure review, local rūnanga were invited to do a walkover of The Wolds Station, to confirm sites and areas of significance. No sites or areas were identified, so The Wolds is surprised to see SASMs identified, and assumes that inclusion is based on a desktop assessment alone.
  - 4.2 The proposed SASMs identified on The Wolds are as follows:
    - 4.2.1 Mt Mary is identified as a land area of significance - a wahi tupuna;
    - 4.2.2 Mary Burn Stream is identified as a fresh waterway of significance due to its use as a mahinga kai food gathering place, and the kowhai that grow along its banks and margins - a wai taoka and wāhi taoka;
    - 4.2.3 Te Wai-a-Kohelrishman Creek is identified as a fresh waterway of significance due to its status as a a kāinga mahika kai, and use as a mahinga kai food gathering place - a wai taoka and wahi taoka.
  - 4.3 The Wolds dispute the extent of the SASM overlays on The Wolds, and submit that they appear to have been identified through desktop and generic assessments, rather than an actual and in depth review/ identification of significant areas. Such an approach falls short of ensuring resources are sustainably managed to enable people and communities to provide for their social, economic, and cultural wellbeing.

- 4.4 The Wolds are not opposed to providing community members and landowners with an opportunity to engage with and respect the history and ongoing significance of the land. In order to ensure buy in from all parties however, they consider it imperative that this is done with accuracy, and that the appropriate levels of consultation are undertaken.
- 4.5 The Wolds support the proposed approach to limit the rules introduced through the Historical and Cultural Values chapter, and to mostly manage SASMs<sup>1</sup> through iwi consultation and standards within other rules in the plan.
- 4.6 The Wolds also consider that the proposed policies contained in the Historical and Cultural Values chapter do not adequately balance the cultural benefits and social/ community costs.
- 4.7 The Wolds wishes to be heard in support of this submission. If others make a similar submission, The Wolds would be prepared to consider presenting a joint case with them at any hearing.
- 4.8 The Wolds does not gain an advantage in trade competition through this submission.
- 5 The Wolds seeks the following decision.
- 5.1 That the proposed provisions be modified as set out in the table attached
- 5.2 Such further or other consequential relief as may be necessary to fully give effect to the matters raised and relief sought in this submission.

Dated 26 January 2024



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Jessica Ottawa/ Katherine Forward  
Solicitor for The Wolds

This document is filed by Katherine Forward of Duncan Cotterill, solicitor for the submitter.

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<sup>1</sup> Other than Rock Art and silent file locations, or specific activities considered offensive to operate near an SASM.

The address for service of the submitter is:

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Documents for service on the submitter may be:

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The Wolds submission relates to:	The Wolds submission is that:	The Wolds seeks the following decisions:
<b>Plan Change 24</b>		
<b>Definition of irrigation</b>	The Wolds maintains some areas of border dyke irrigation and is concerned that a “constructed system” may be interpreted to exclude existing border dyke irrigation.	Amend definition of irrigation as follows:  <i>“Means the activity of applying water to land by means of a constructed system, including lawfully established flood (border dyke) irrigation system(s), for the purpose of assisting production of vegetation or stock on that land”</i>
<b>Historical and Cultural Values</b>  SASM-03  SASM-P1  SASM-P6	<p>The Wolds respects that mana whenua are best placed to identify areas of significance and their values but considers that identification ought to be subject to a collaborative process which includes local rūnanga, any affected landowner, and the Council. For example, it may be necessary for site visits to be undertaken to confirm desktop values, or otherwise.</p> <p>The Wolds acknowledges that managing adverse effects on identified SASM is important but considers that the functional and operational need for some activities, as well as providing for renewal of existing and lawfully established activities (to acknowledge investment) to locate in SASM, cannot be</p>	<p>Amend SASM-P1 to build in provision for a collaborative process for identifying areas of significance.</p> <p>Amend SASM-P6 as follows:</p> <p><i>“Enable land use activities that make efficient use of land and resources while managing <del>manage</del> the adverse effects of activities within SASMs identified in SASM-SCHED1, SASM-SCHED2, SASM-SCHED3 and SASM-SCHED4 are not compromised, by....”</i></p> <p>Further amend SASM-03 and SASM-P6 to ensure there is not a blanket approach to avoiding all forms of land use and development within identified SASM where effects can be adequately remedied or mitigated or where land use is existing and lawfully established.</p>

	<p>avoided. The Wolds considers that these provisions should also contemplate existing uses of land subject to SASMs and the protection of those activities.</p>	
<p><b>SASM Maps and related schedules</b></p>	<p>As above, The Wolds considers that a ground-truthed review of the mapped and scheduled SASMs needs to be undertaken to confirm location, extent, and significance. SASM55, the Mary Range traverses the Wolds Station.</p>	<p>Delete SASM55 or in the alternative follow a collaborative identification process as detailed in this submission.</p> <p>Amend the SASM overlays and schedules to align with ground-truthed outcomes.</p>