
**SUBMISSION OF THE WOLDS STATION LIMITED (THE WOLDS)
ON PLAN CHANGE 27, TO THE MACKENZIE DISTRICT PLAN**

26 January 2024

To Mackenzie District Council

This is a submission on proposed Plan Change 27 – Subdivision, Earthworks, Public Access and Transport (**PC27**) 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 PC27 that this submission relates to, and the Wolds position in relation to the same, are identified in the attached table.
- 4 PC27 deals with provisions relating to subdivision within and outside Farm Base Areas within the Te Manahuna / Mackenzie Basin ONL, however it is understood (from notification documentation) that these provisions are not within the scope of this plan change. On that basis, this submission does not address the operative Farm Base Areas or related provisions.
- 5 The Wolds general comments are as follows:
 - 5.1 The section 32 report does not adequately assess the costs of the proposed subdivision provisions, including the impact on The Wolds and other landowners. The proposed provisions will curtail new development and severely impinge landowner ability to make reasonable use of their interest in the land and provide for their retirement and for future generations. Farm succession is a critical component of maintaining a viable farming unit. This is particularly relevant to The Wolds as we transition farm operations to the next generation.
 - 5.2 The proposed provisions will not achieve sustainable management, including enabling people and communities to provide for their social and economic wellbeing.
 - 5.3 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.
 - 5.4 The Wolds does not gain an advantage in trade competition though this submission.

6 The Wolds seeks the following decision:

- 6.1 That the proposed provisions be modified as set out in the table attached.
- 6.2 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



Jessica Ottowa/ Katherine Forward
Solicitor for The Wolds

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

The address for service of the submitter is:

Duncan Cotterill
Duncan Cotterill Plaza
148 Victoria Street
Christchurch 8013

Documents for service on the submitter may be:

- Left at the address for service.
- Posted to the solicitor at 148 Victoria Street, Christchurch 8013
- Transmitted to the solicitor by fax on +64 3 3792430

Please direct enquiries to:

Katherine Forward
Duncan Cotterill
Tel +64 3 379 2340
Fax +64 3
Email Katherine.Forward@duncancotterill.com

The Wolds submission relates to:	The Wolds submission is that:	The Wolds seeks the following decisions:
Plan Change 27		
Subdivision SUB-R13 SUB-P2 SUB-P4	<p>SUB-R13 proposes to make subdivision within or partially within a Lakeside Lakeside Protection Area, Scenic Viewing Area, or Scenic Grassland a non-complying activity.</p> <p>In addition, Policy SUB-P2 requires subdivision to '<u>maintain and enhance</u>' the amenity values and the quality of the environment by following natural and physical features such as the landscape, topography, and established vegetation of the site' and SUB-P4 provides that subdivision areas with important natural and cultural values can only be allowed where it will not compromise the identified values.</p> <p>The non-complying activity status when viewed in light of these Policies would make subdivision that captures these areas extremely difficult to obtain consent.</p> <p>The Wolds considers that the non-complying activity rule should not apply where the subdivision will have no material impact/ change on the listed areas. In addition, SUB-R13 should not apply to subdivision where the lots to be created comply with the listed minimum lot size for the zone. The Wolds also consider that an exemption ought to be provided which enables a more permissive pathway for minor boundary adjustments.</p>	<p>That the non-complying activity rule not apply where the resulting blocks remain economic and viable farming units; where the subdivision will not dissect a scenic grassland area etc.; or where a minor boundary adjustment is being undertaken. This is critically important to enable a pathway for farm succession.</p> <p>Amend the policy framework reflect more achievable standards to provide a clear pathway for subdivision to obtain consent within the listed areas.</p>

	<p>The Wolds considers that proposed Policy SUB-P2 is unrealistic, on the basis that any subdivision (especially within the Mackenzie Basin ONL) will find it immensely challenging to enhance the amenity values and quality of the environment, especially given the highly modified nature of the environment, and the increasing populations of introduced species (regardless of the land use/ land tenure).</p> <p>The Wolds considers that proposed Policy SUB-P4 introduces an excessively onerous policy framework on applicants within the identified natural and cultural environments. “Only allowing” will be interpreted as “avoid” and have the same result – effectively prohibiting subdivision in the listed areas. It is fair to say that all of the Mackenzie Basin ONL will likely be considered to have ‘important natural and cultural values’ and it will be very difficult to demonstrate that subdivision will not compromise those values.</p>	
<p>Earthworks in the General Rural Zone</p> <p>EW-R4</p>	<p>The Wolds supports the extension of the proposed earthworks volume thresholds within the rural zone.</p> <p>The Wolds considers this to be a more realistic reflection of the expectations within the Rural Zone. The proposed quantity standards still provide an adequate level of oversight and management of the environment and resource, but provide for a more balanced cost assessment when considering the reduction in consenting processes that will be required.</p>	

Earthworks within Scenic Grassland Areas and Scenic Viewing Areas EW-S5	All earthworks are proposed to be discretionary in Scenic Viewing Areas and Scenic Grassland Areas. The Wolds considers that a certain level of earthworks should be a permitted activity in listed areas. Small scale earthworks do not justify the imposition of a discretionary activity status, and can be achieved so as not to compromise identified environmental values	That a permitted activity rule be included for small scale earthworks within the Scenic Viewing and Scenic Grassland Areas. This is important to ensure new small scale work programmes can be completed efficiently.
---	---	---