



PLAN CHANGE 23 – RURAL AND NATURAL ENVIRONMENT

SUBMISSION ON PROPOSED PLAN CHANGE 23 TO THE MACKENZIE DISTRICT PLAN

**FORM 5
UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT
1991**

Details of Submitter

Full Name: <i>(Required)</i>	Grampians Station Limited
Contact Person: <i>(If different from above)</i>	Nicola Hornsey
Email Address: <i>(Required)</i>	nicola@gresssons.co.nz
Postal Address: <i>(Optional)</i>	
Telephone Number: <i>(Required)</i>	03 687 8004
Fax <i>(Optional)</i>	

Trade Competition

Grampians Station Limited could not gain an advantage in trade competition through this submission.

If you have selected could, please answer the question below:

I am / I am not (*delete one*) directly affected by an effect of the subject matter that:

- a. adversely affect the environment; and
- b. does not relate to trade competition or the effects of trade competition.

Submission Details

The specific provisions of the proposal that my submission relates to are as follows:

As set out in Annexure A attached.

I support/oppose these provisions:
(*include whether you support or oppose in full or in part*)
As set out in **Annexure A** attached.

The reason(s) for my submission are:
(*state in summary your reasons, and whether you seek any amendments*)
As set out in **Annexure A** attached.

I seek the following decision from the Mackenzie District Council:
(*give precise details*)
Grampians Station Limited seeks the following decisions from Council:

- That the decisions sought in **Annexure A** to this submission be accepted and/ or
- Amendments to the provisions of PC23 to address the substance of the concerns raised in this submission; and
- All consequential amendments required to address the concerns raised in the submission and ensure a coherent planning document.

I wish to be heard in support of my submission.
 I do not wish to be heard in support of my submission.
(Tick one box)

If others make a similar submission I **would** be prepared to consider presenting a joint case with them at any hearing.



Signature of submitter or person authorised to sign on behalf of submitter
(A signature is not required if you make your submission by electronic means.)

26 January 2024

Date:

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language; or
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Once the closing date for submissions has passed, Council will publicly notify all submissions received, prepare a summary of submissions, and will allow a period for further submissions in support of, or in opposition to, those submissions already made.

Council hearings for Plan Changes 23 to 27 will then be arranged to consider all submissions. Anyone who has made a submission and indicated that they wish to be heard will have the right to attend the hearings and present their submission.

If you have any questions regarding Plan Change 23 or the submission process, please do not hesitate to contact the Planning Department at 03 685 9010 or via email districtplan@mackenzie.govt.nz

ANNEXURE A – REASONS FOR SUBMISSION AND DECISIONS SOUGHT BY GRAMPIANS STATION LIMITED – PLAN CHANGE 23

Section/ Provision	Specific provision of the Proposed Mackenzie District Plan Change 23 to which submission relates			Decision Sought
	Support/Oppose/New	Reasons		
Part 1 – Introduction and General Provisions				
Definition	Land rehabilitation	Oppose in part –	The control of wilding conifers is a district wide issue and the ability to remediate land and prevent reinfestation following the removal of wildings should not be limited to the removal of closed canopy wilding conifers.	
Definition	Pastoral intensification	Support	<p>The removal of subdivisional fencing from the definition will enable farmers to meet their obligations to fence waterways, undertake fencing following tenure review, practice good land management and protect areas of vulnerability.</p> <p>While noting that Plan Change 18 is under appeal, support is recorded for the retention of the current definitions of Improved Pasture and Agricultural Conversion in conjunction with the notified proposed Plan Change 23 definition of Pastoral Intensification.</p>	<p>Amend definition to read: earmo removal of wilding conifers through restoration of pasture through means including cultivation, root-raking, direct drilling, fencing, topdressing and oversowing.</p> <p>Adopt proposed definition as notified.</p>
Definition	Rural Tourism Activity	Support	This definition reflects the diversification of activities that are developing in the District to enable traditional farming operations to remain economically viable so that they can continue to maintain the landscape values prioritised by the Plan and afford to fund conservation initiatives.	Adopt proposed definition as notified
Definition	Shelterbelt	Support		Adopt proposed definition as notified
Natural Character				
NATC-R1	Buildings and Structures (excluding fences and water troughs)	Support	This rule gives effect to the Natural Character Policies.	Adopt proposed Rule as notified
NATC-R2	Earthworks and Stockpiles	Support	This rule gives effect to the Natural Character Policies.	Adopt proposed Rule as notified
NATC-R3	Woodlots	Support	This rule gives effect to the Natural Character Policies.	Adopt proposed Rule as notified
NATC-S1	Activity/ Setbacks from Surface Waterbodies	Support	This standard gives effect to the Natural Character Policies	Adopt proposed Standard as notified
Table NATC-1	Surface Waterbody Setbacks	Support	This Table gives effect to the Natural Character Policies	Adopt proposed Table as notified.

Specific provision of the Proposed Mackenzie District Plan Change 23 to which submission relates	Submission	Decision Sought
Section/ Provision	Support/Oppose/New	Reasons
Natural Features and Landscapes		
NFL-O2	Te Manahuna /Mackenzie Basin ONL	Support
NFL-P1	Protection of Outstanding Natural Features and Landscapes	<p>Oppose in part</p> <p>It is important to continue to recognise and acknowledge the contribution pastoral farming has made to the valued landscape of the Te Manahuna/Mackenzie Basin, to allow for pastoral intensification (as redefined by Proposed Plan Change 23), to permit and enable development within Farm Base Areas as well as the maintenance of improved pasture (as defined by Plan Change 18) and appropriate pastoral intensification and/or agricultural conversion of farmland.</p> <p>To re-order the list so that recognition of working pastoral farms comes first and is consistent with NFL-P2 (Plan Change 13).</p>
NFL-P7	Pastoral Farming	<p>Support</p> <p>Consistent with the recognition that it is pastoral farming that has contributed so significantly to the landscape values that have given rise to the classification of Te Manahuna/Mackenzie Basin as an Outstanding Natural Landscape.</p>
NFL-P10	Harvest of Closed Canopy Wilding Conifers	<p>Oppose in part</p> <p>Enabling the removal of all wilding conifers, whether dense closed canopy or not, should be a priority in the Council's Plan. Similarly, the rehabilitation of land following the removal of these pest species should also be permitted throughout the district, so that the land is returned to productivity and the pastoral farming landscape is restored.</p>
NFL-P11	Wilding Conifer Spread	<p>Oppose in part</p> <p>Enabling control of the spread of wilding conifers by the use of stock grazing should be permitted throughout the district. The spread of wilding conifers is proceeding apace. Any restriction on the ability to control regrowth by way of stock grazing would result in an amplification of this major threat to land productivity, indigenous biodiversity and the landscape. So that stock can graze such areas, farmers also need to be able to grow and maintain pasture.</p>
NFL-R5	Earthworks	<p>Support</p> <p>Recognises the need to carry out minor earthworks as part of farming activities</p>
NFL-R6	Harvest of Closed canopy Wilding Conifers	<p>Oppose in part – request changes or additional New rule</p> <p>The control of wilding conifers is a district wide issue and the ability to harvest wilding conifers should not be limited to the removal of closed canopy wilding conifers.</p>
		<p>Adopt proposed Rule as notified.</p> <p>Adopt proposed Rule as notified and add new Rule for harvest of non-closed canopy wilding conifers</p> <p>NFL-R X</p> <p>Or</p> <p>Amend proposed rule by removing words "closed canopy" and Overlay on the Planning Maps</p>

Specific provision of the Proposed Mackenzie District Plan Change 23 to which submission relates		Submission	Decision Sought
Section/ Provision	Support/Oppose/New	Reasons	
NFL-R7	Land Rehabilitation following harvest of Closed Canopy Wilding Conifers	Oppose in part	<p>The control of wilding conifers is a district wide issue and the ability to remediate land and prevent reinfestation following the removal of wildings should not be limited to the removal of closed canopy wilding conifers or be constrained or delayed by having to seek a Resource Consent.</p> <p>Where:</p> <ol style="list-style-type: none"> <i>The wilding conifers have been removed in accordance with NFL-R6 or NFL-Rx.</i> <i>The land is placed into pasture grass for the grazing of livestock.</i> <i>The land is not irrigated.</i> <p>Advice Note: <i>NFL-R3 does not apply to activity undertaken in accordance with this Rule</i></p>
NFL-R8	Topdressing and Oversowing within Wilding Conifer Overlay Areas	Oppose in part	<p>The control of wilding conifers is a district wide issue and the ability to remediate land and prevent reinfestation following the removal of wildings should not be limited to the removal of closed canopy wilding conifers or be constrained or delayed by having to obtain a Resource Consent.</p> <p>Where:</p> <ol style="list-style-type: none"> <i>The wilding conifers have been removed in accordance with NFL-R6 or NFL-Rx.</i> <i>The land remains pasture grass for the grazing of livestock.</i> <p>Advice Note: <i>NFL-R3 does not apply to activity undertaken in accordance with this Rule</i></p>
NFL-R10	Commercial Forestry and Woodlots	Oppose in part	<p>Woodlots (as defined) should be permitted activities in the GRUZ</p> <p>Clarify Rule to ensure only Commercial Woodlots are covered by this Rule Or Amend Rule so that it does not conflict with NATC-R3.</p>
NFL-R11	Shelterbelts	Support	<p>Shelterbelts assist with the protection of stock, crops and buildings from strong winds</p> <p>Adopt proposed Rule as notified.</p>
General Rural Zone			
GRUZ-P4	Protecting Highly Productive Land		<p>Objection is made to the classification of parts of the land farmed by Grampians Station Limited as HPL Class 3 land.</p> <p>The land identified is high altitude dryland, primarily used for the grazing of stock. The climatic extremes of this region limits the ability to intensify and/or change land use.</p> <p>It is submitted that this land does not meet the definition of Class 3 HPL. It is noted that the Government has stated its intention to remove the Class 3 category from the National Policy Statement entirely.</p> <p>Amend Overlay Map to delete that part of the Highly Productive Land overlay that covers land farmed by Grampians Station Limited.</p> <p>Add wording to Policy to provide for appropriate new compatible activities on Highly Productive Land.</p>

Specific provision of the Proposed Mackenzie District Plan Change 23 to which submission relates	Submission	Decision Sought
Section/ Provision	Support/Oppose/New	Reasons
GRUZ-P7	Wilding Conifers	<p>If the land is not reclassified (in whole or in part) then this Policy needs to be extended to recognise that new activities are permitted where they are compatible with the continuation of existing farming uses.</p> <p>Grampians Station Limited supports the MDC's approach to facilitating the removal of wilding conifers to address the effects associated with the spread of wildings across the Mackenzie District.</p>
GRUZ-R9	Rural Tourism Activity	<p>Support</p>
GRUZ-R10	Residential Visitor Accommodation	<p>Support</p>
GRUZ-15	Aircraft and Helicopter Movements	<p>Support</p>
Planning Maps		<p>New</p> <p>The control of wilding conifers is a district wide issue and the ability to harvest wilding conifers should not be limited to the removal of closed canopy wilding conifers.</p>
Wilding Conifer Removal Overlay		<p>New</p> <p>The control of wilding conifers is a district wide issue and the ability to remediate land and prevent reinfestation following the removal of wildings should not be limited to the removal of closed canopy wilding conifers.</p>
Wilding Conifer Management Overlay		<p>New</p> <p>Assessment of those parts of the land farmed by Grampians Station Limited as Class 3 Highly Productive Land is not accepted.</p>
Highly Productive Land Overlay	Revised Grampians Station FBA	<p>Revised FBA boundary better reflects the topography and existing development of the FBA for Grampians Station</p>
Farm Base Area	Revised Grampians Station FBA	<p>Support</p> <p>Amend Grampians Station Farm Base Area as notified in Proposed Plan Change</p>

ANNEXURE A – REASONS FOR SUBMISSION AND DECISIONS SOUGHT BY GRAMPIANS STATION LIMITED – PLAN CHANGE 24

Specific provision of the Proposed Mackenzie District Plan Change 24 to which submission relates		Decision Sought	
Section/ Provision	Support/Oppose/New Reasons	Sites and Areas of Significance to Maori	
Sites and Areas of Significance to Maori			
SASM-P4	Oppose in Part	The Policy is supported however the responsibilities of landholders and managers under Health and Safety legislation needs to be recognised and specifically referenced in this Policy	Amend Policy wording to read: Maintain existing access to SASM for manu whenua and encourage landowners to explore opportunities and methods to provide new access to SASM, where requested by mana whenua <i>in a way that ensures health and safety obligations to the public can be met</i> .
SASM-R1	Oppose in part	The responsibilities of landholders and managers under Health and Safety legislation needs to be recognised and specifically referenced in this Rule	Amend wording of rule to include the following: Activity Status: PER Where <i>health and safety obligations to the public can be met</i> : 1. The purpose ...
Planning Maps			
SASM Mapping Overlay	Oppose in Part	Grampians Range would like to better understand the reasons for the extent of the SAMs overlay that is on land farmed by Grampians Station Limited so that it can be confirmed that the mapping of the overlay is correct.	Boundaries of SASM Mapping Overlay as it relates to land farmed by Grampians Station Limited to be confirmed only once consultation with mana whenua has been undertaken

