

DDPR_feedback_0047s		
	Name	Kate Macgregor
	Organisation	Kate Macgregor and Paul Murcott
	Email	████████████████████
	Response Date	Aug 26 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
Q4	Feedback/Comments	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	

P K M Farms Limited
82 Paradise Gully Road
13 DRD
Oamaru

25.08.2022

RE: Draft District Plan

To the Councillor's, Waitaki District Council

Please accept this letter as our submission regarding the Draft District Plan, that we send as a landowner in the Waitaki District. Our property is located at 82 Paradise Gully Road, Ngapara.

Valuation Number 26120/15400
Legal Description LOT 1 DP 2039A

We are writing in as the Draft District Plan has mapped and identified areas of significance on our property. We write as landowners to ensure we protect our Freehold Property Rights, for us as the current landowners, as well as protecting the rights of the future generation of landowners.

Based on the current mapping and rules within the draft plan we do not support the plan going forward in its current state. We have concerns regarding the rules themselves, as well as the evidence and methodology behind the mapping.

As shown on the map below, our property has Significant Natural Features, Sites and Areas of Significance for Maori as well as Highly Productive Soils mapped within the title. We do not agree with the mapping of the SNF and SASM on the property and have reason for serious concern as to how these areas were identified.

As per the detail provided by the Council in Schedule 5 of the Draft Plan the SASM refers to Otewhakaui as a wahi mahika kai where weka, tuna (eels) and koareare were gathered as well as a site of rock art. On close inspection, of the area identified on the map, we have found no evidence of this as identified above and contest the classification of this area on the land title. It appears this outline is extremely broad and has been made with no knowledge of the landscape or site-specific details and it is this lack of specific detail which questions the authenticity of this mapping.

We cannot find detail of the outlined SNF024 on the property but assume it relates to the same limestone cliff. Again, the outline of the mapping has no direct correlation to the lay of the land or the cliff face itself which shows the broad-spectrum brush that has been used to identify areas within the Waitaki District.

There are no specific features on the property, such as limestone drawings or urupā therefore we contest the mapping of SASM on the property. The limestone cliffs are visually aesthetic however

they are a landscape feature rather than a Significant Natural Feature. These cliff faces, without being managed, are naturally covered in weeds.

We request that the mapping of the SNF and SASM be reviewed on the property and without further evidence these be removed from the mapping overlay.

Areas of the property have been mapped as Highly Productive Soils; this is more reflective of the property however again there appears to be no knowledge of the landscape with the outline of this classification. We therefore ask this be reviewed to better match the lie of the land.

Further, we do not support the definition of Agricultural Intensification. Rules from Local, Regional and Central Government all plan to restrict Agricultural Intensification however this goes against the premise of property and existing use rights as landowners. There is also a lack of consistency with the definition of Agricultural Intensification between the three government organisations.

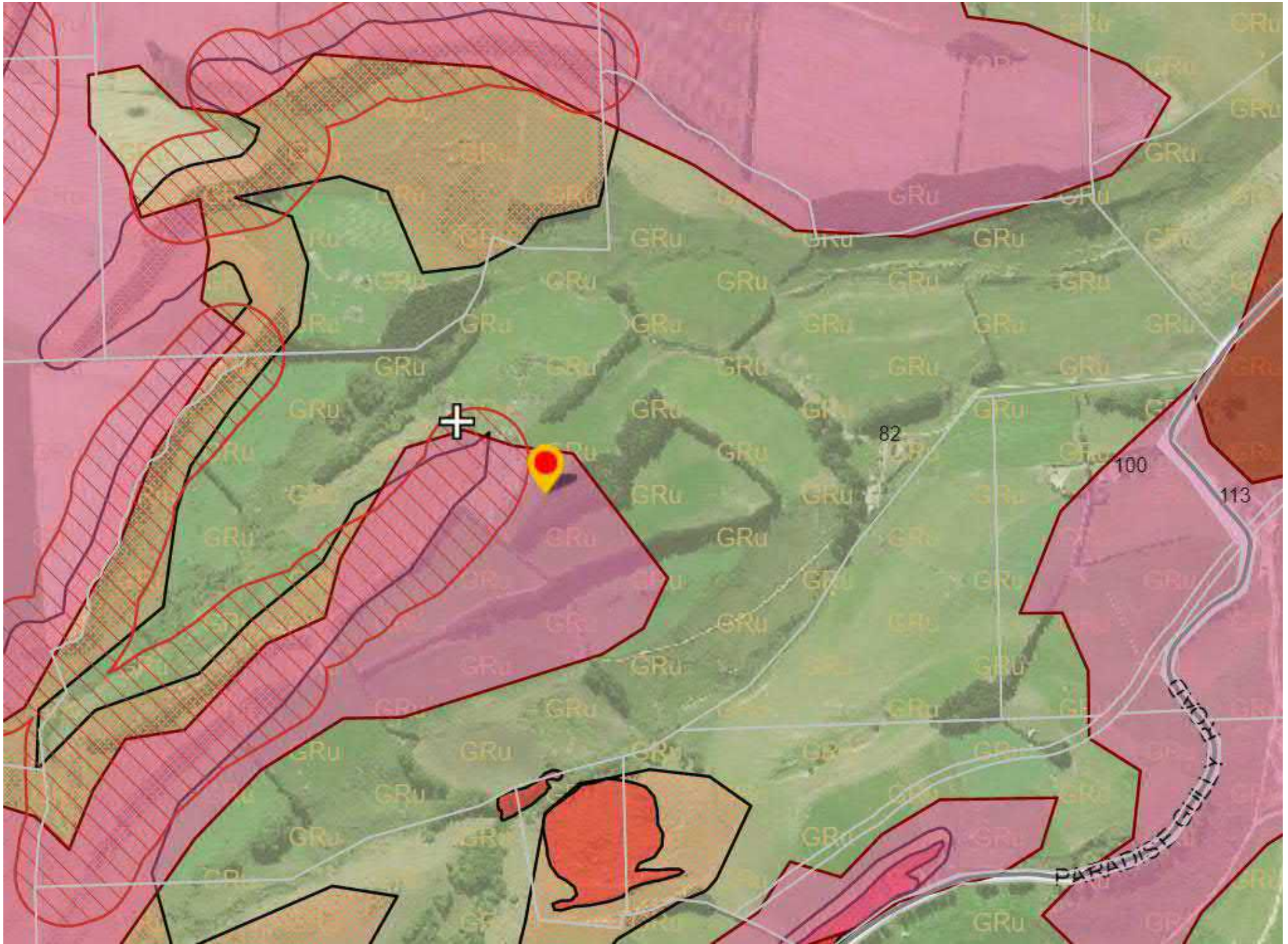
We are proud landowners that respect the environment in which we farm, we have chosen a farming system which suits the soils, slope and climatic conditions in which we are located. Like the majority of farmers in North Otago, our farms are our livelihood which is a key driver in us protecting and enhancing the landscapes in which we live, work and raise our families in.

We appreciate your consideration of our submission and would happily speak to any interested councillor.

Regards,

Paul Murcott and Kate Macgregor

Directors PKM Farms Limited



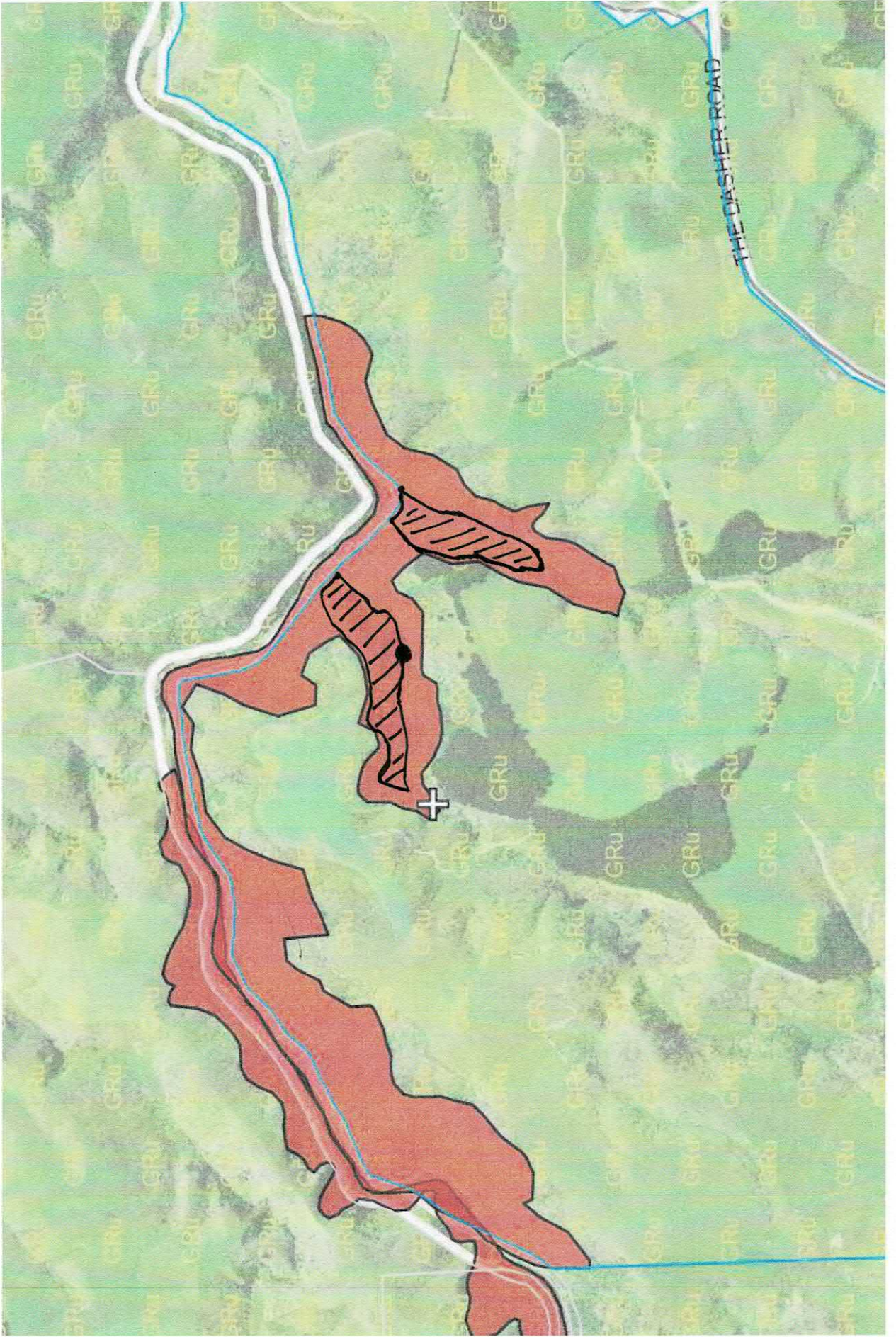
DDPR_feedback_0308s	
Name	Kate Macgregor
Organisation	
Email	
Response Date	Aug 18 22 08:10:01 pm
Notes	Kate Macgregor
Q1	Select the chapter you want to provide feedback on
	Infrastructure
Q2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q3	Objective/Policy/Rule/Standard
	INF-R2 and INF-S17
Q4	Feedback/Comments
	Limiting removal of indigenous vegetation and earthworks within an SNA to 20m2 without consent in a farming environment is extremely impractical. In many instances this would not allow a new fence line to be bulldozed in, a track to be established for stock to have access to water, or even a waterline to be pulled through the SNA to ensure stock water availability.
Q5	Objective/Policy/Rule/Standard
	INF-S16
Q6	Feedback/Comments
	Oppose how the ONF, ONL, SNA, SNF's and Rural Scenic Landscapes have been identified. Multiple instances of landscapes in the district being identified as the above however the geographic outline of these identified "SNA's" does not match the lie of the land or the feature itself.
Q7	Objective/Policy/Rule/Standard
	INF-S13
Q8	Feedback/Comments
	Requirement to have sealed or over sow an area that has had earthworks carried out within a 3 month period will not be practicable in some instances. Earthworks that were completed at the end of May can have grass seed thrown on them however due to soil temperatures this is unlikely to have any positive environmental benefit until it has struck and established. Having a time limit as a general rule is too restrictive, this should be determined based on the conditions and timings of each consent.
Q9	Objective/Policy/Rule/Standard
Q10	Feedback/Comments
Q11	Supporting documents?
Q12	If you need more space, or have other general comments, please leave them here

DDPR_feedback_0316s	
Name	Kate Macgregor
Organisation	
Email	
Response Date	Aug 19 22 03:07:30 pm
Notes	Kate Macgregor
Q1	Select the chapter you want to provide feedback on
	Hazardous Substances
Q2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q3	Objective/Policy/Rule/Standard reference:
	HAZS-P5/HAZS-R1
Q4	Feedback/Comments
	While I support some sort of rules around where hazardous substances can be stored and used the practicality of this Policy and Rule in a rural context is unworkable. Under the definition of Hazardous Substance a chemical used for weed control could be identified as having a toxicity property. As such a consent would be required to use and/or store this. In the instance where spray is being used to manage weeds within a SNF/ONF/ONL or even on pasture that is in an area identified as being SASM where weed control is required in pasture. This then overlaps with Productive Soils in many instances and there is a conflict here within the rules as some chemicals will be required for production on this high producing soils. I also object in that a consent would be required in instances for chemical and fuel storage on properties dependant on their location within an identified sensitive zone with no consideration of quantity stored. I would have thought storage in a certified and well maintained fuel tank of 200L fuel would be relatively low risk and therefore this being a discretionary activity is not logical.
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here

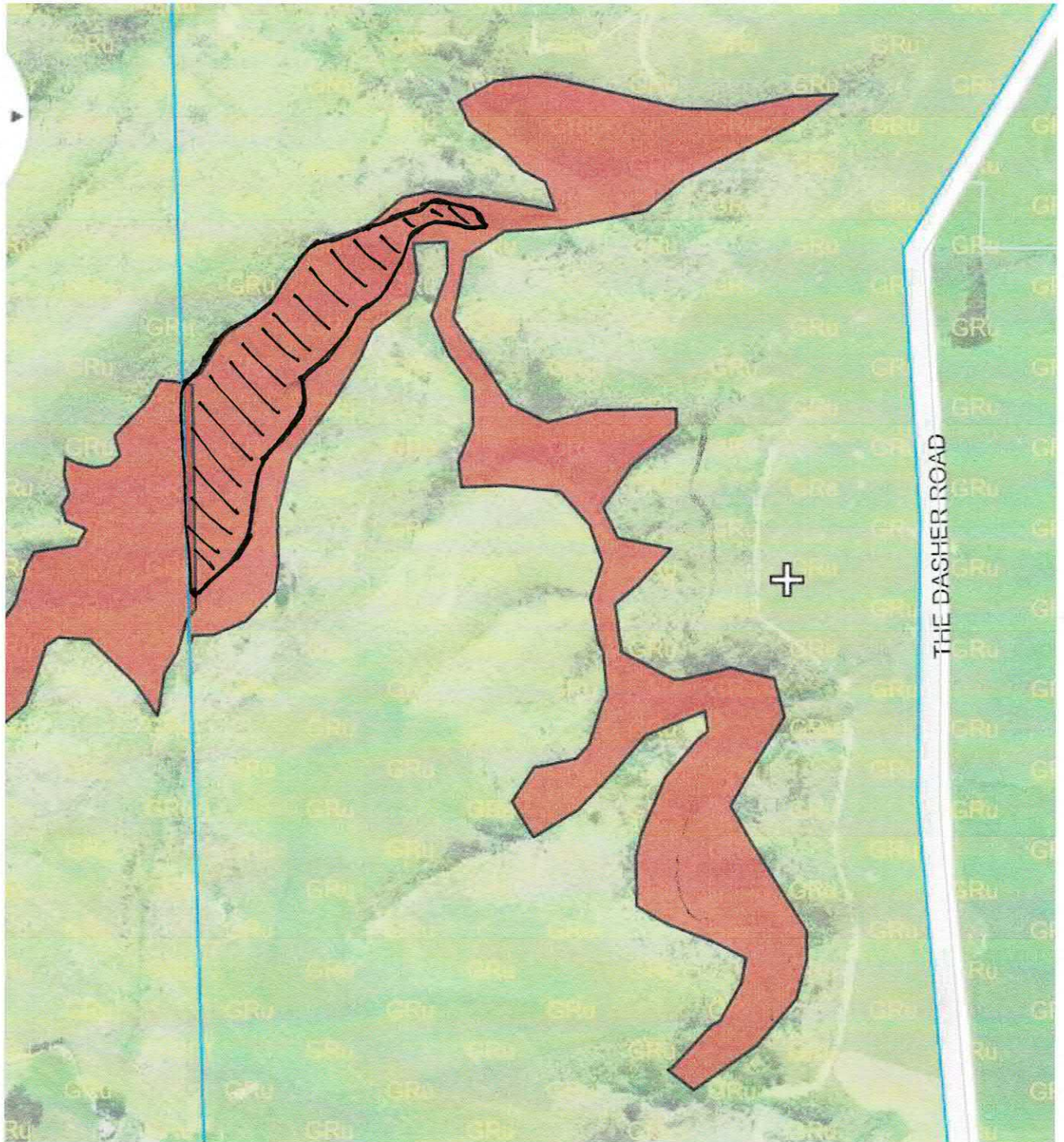
DDPR_feedback_0324s	
Name	Kate Macgregor
Organisation	
Email	
Response Date	Aug 22 22 08:18:59 pm
Notes	Kate Macgregor
Q1	Select the chapter you want to provide feedback on
	Ecosystems and Indigenous Biodiversity
Q2	In general, to what extent do you support the contents of this chapter?
	Strongly oppose
Q3	Objective/Policy/Rule/Standard
	ECO-02
Q4	Feedback/Comments
	<p>Firstly I oppose how SNA's have been identified, this has been done by a landscape artist who has not been over the area and is therefore very inaccurate. An area identified as an SNA on a property we manage is significantly inaccurate with another property within the farm ownership group also having inaccurate mapping.</p> <p>Secondly, the fact that these "identified SNA's" are still existent with indigenous vegetation thriving in many instances, shows how the rural community are already farming without impacting these areas. The unintended outcomes from these rules far outweigh the benefits.</p>
Q5	Objective/Policy/Rule/Standard
	ECO-03
Q6	Feedback/Comments
	<p>Areas identified as SNA's, due to the restrictive nature and unintended consequences of the rules, have no land value to the land owner. This reduces the value of their farm and impacts their equity in the property. These areas therefore should be exempt from paying rates and require a fair value to be placed on them and "paid for" by the crown.</p> <p>The ability of farmers to use these areas to offset carbon emissions, or enter them into the ETS, will also be impacted by the SNA identification, however entering these areas into the ETS would be a significant incentive to ensure the protection and enhancement of these areas.</p> <p>These rules are specific to rural areas and exclude urban, there is no logic here and it has a severe impact on livelihoods.</p>
Q7	Objective/Policy/Rule/Standard
	ECO-R4
Q8	Feedback/Comments
	<p>Strongly oppose restrictions on agricultural intensification on land adjacent to a SNA. This is hugely restrictive on a land owner and has assumed consequences on the biodiversity of an SNA. This makes areas of mapped Productive Land unworkable and is contradictive of the mapping of productive land.</p> <p>There is no definition of adjacent therefore is this 10m, 100m or 1km or a property boundary from the SNA</p>
Q9	Objective/Policy/Rule/Standard
	ECO-S1
Q10	Feedback/Comments
	<p>Controlled burning has been a farming practice carried out for many years throughout New Zealand. It is done for a variety of reasons and is a controlled activity. The requirement for, and conditions that come with, a consent are impractical and unworkable for farmers. For example, currently asking that a burnt area (which is a small % of a total block) be rested for 12 months from grazing stock is unworkable. This might be 20ha burn area over a 400ha block. Farmers carrying out this practice are the most qualified to assess the risks, required mitigations and consequences of these burns.</p> <p>The requirement for an ecological report, costing thousands of dollars, for the task being requested is far outside of the scale of the request.</p> <p>This rule will push farmers away from controlled burning which will make uncontrolled wildfires over this sort of country a much higher risk with significantly more negative impacts.</p> <p>Controlled block burning allows animals to relocate to areas that do not burn or are not being burnt which helps protect biodiversity.</p>

Q1 1	Supporting documents? https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/e564e850dc107b80ae49ea7c338423f0e78ce543/original/1661156329/f10848ed235bc1f8cc944371ad273d73_WDC_SNA.pdf?1661156329
Q1 2	If you need more space, or have other general comments, please leave them here
	Attached are two identified SNA's. Based on the knowledge of the Farm Owner and Farm Manager we have drawn in the areas that are of quality indigenous biodiversity. The remainder of the drawn proposed SNA is gorse, wilding pines and/or already improved pasture that has been over sown. The outlined areas that the farm owner has identified already has a plan to plant some supporting indigenous biodiversity to help encourage further enhancement however the restrictive rules outlined are making this more of a deterrent due to the unintended consequences of the rules.

SNA 125



SNA 126



DDPR_feedback_0325s	
Name	Kate Macgregor
Organisation	
Email	
Response Date	Aug 22 22 09:15:33 pm
Notes	Kate Macgregor
Q 1	Select the chapter you want to provide feedback on
	Natural Features and Landscapes
Q 2	In general, to what extent do you support the contents of this chapter?
	Strongly oppose
Q 3	Objective/Policy/Rule/Standard
	NFL - P1
Q 4	Feedback/Comments
	The mapping and identification and mapping of these features is not geographically consistent with the feature being identified. The overlay with the SASM's for the same said feature also do not align which shows the significant issue with the process of these identifications. Then these areas can also overlay with productive soils mapping. This then means contradictory rules apply to this land and makes a mockery of this process showing the lack of knowledge and practicality of this mapping. Example attached for our property, 82 Paradise Gully Road.
Q 5	Objective/Policy/Rule/Standard
	NFL-R5
Q 6	Feedback/Comments
	As above some areas identified on our property as an SNA are irrigated pasture land and are also identified as Highly Productive Soils. One identification is to ensure this land is maximised for food production while the other rule is limiting the food production potential.
Q 7	Objective/Policy/Rule/Standard
	NFL-R9
Q 8	Feedback/Comments
	If plantation forestry is already on a SNF then surely the ability to replant this area would be allowed otherwise the use is then limited as it cannot be over sown due to agricultural intensification rules and may be uneconomic for a farm owner to plant in any other indigenous species. Therefore the SNF becomes a weed garden.
Q 9	Objective/Policy/Rule/Standard
	NFL-S1
Q 10	Feedback/Comments
	Support the encouragement of colours and materials that suit/match the natural landscapes.
Q 11	Supporting documents?
	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/8cd747a0ee6878b1e4977c4400186822c0319a09/original/1661159676/908e88dcdf73fc8ebbd7303ee9ac1108_82_Paradise_Gully_Road_Limestone_Cliff_actual_locations.pdf?1661159676

Q 1 2	If you need more space, or have other general comments, please leave them here
	<p>NFL-R6 discourages plantings that may be of environmental benefit. For example fencing and planting CSA's, requiring consent to carry out such work would then be contradicting the NES:FW regulations.</p> <p>The property on Gibson Road that is mapped as a ONF and SASM, the Otago Regional Council have been on farm and classed this area as not part of the river bed therefore the mapped area should be removed from this farm to reflect that.</p> <p>The property on Paradise Gully Road, the map attached shows the actual location of the limestone cliffs which removes the significant area of productive irrigated farmland that has been included in the SASM and SNF zones. These areas are significantly smaller in reality and I request that these areas on the map be reduced to that shown in the attachment to reflect this.</p>

82 Paradise Gully Road – Location of Limestone Cliffs



actual location of limestone cliffs.

DDPR_feedback_0334s	
Name	Kate Macgregor
Organisation	
Email	
Response Date	Aug 23 22 08:52:23 pm
Notes	Kate Macgregor
Q1	Select the chapter you want to provide feedback on
	General Rural Zone
Q2	In general, to what extent do you support the contents of this chapter?
	Neutral
Q3	Objective/Policy/Rule/Standard reference:
	GRU-R15
Q4	Feedback/Comments
	Support the concept of protecting our productive land from plantation forestry however I still think these rules, or classifying this as a Controlled Activity, is too broad and would continue to allow large areas of pine trees to be planted. I think planting the steep faces of a farm in pines is different to planting a total farm holding in pines, where productive rolling land is then removed from food production.
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here