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	Name	Adrian Low
	Organisation	on behalf of Lake Ohau Station Limited
	Email	████████████████████
	Response Date	Aug 31 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?	
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Q12	If you need more space, or have any other general comments, please leave them here	

31 August 2022

Draft District Plan Feedback
Waitaki District Council
By Email: planreview@waitaki.govt.nz

To whom it may concern

RE: Lake Ohau Station Feedback on the Draft District Plan

Our client, Lake Ohau Station Limited (**LOSL**), owns Lake Ohau Station, a large rural property of 8,326ha, situated on the north-western edge of Lake Ohau, on the true right bank of the lower Hopkins River and within the Maitland Valley. The boundaries of the Station are shown in Figure 1 below.

Lake Ohau Station varies in altitude from approximately 500m asl to approximately 2,100m asl. It includes some very steep terrain, as well as some gently contoured to flat lush green terraces adjacent to the lake and Hopkins River. The Station is a dryland farm which is currently utilised to winter approximately 6,000 merino sheep and 140 breeding cows. The majority of the sheep are wethers with a focus on fine wool production and maintaining sufficient ewes to breed replacements. Lake Ohau Station also operates “The Quarters” on the river flats, comprising self-catering accommodation for up to 24 people.

Under the Draft District Plan:

- The entirety of Lake Ohau Station is within the Rural General Zone;
- The entirety of Lake Ohau Station (including the improved pasture on its flat terraces and the area containing the Quarters accommodation facility) is within an Outstanding Natural Landscape (**ONL**) (ONL – 01 Ohau and Hopkins);
- Several areas of Lake Ohau Station are identified as Outstanding Natural Features (ONF 007 - Hopkins Roche Moutonee and Wetlands; ONF008 – Temple River Wetland; and ONF009 – Hopkins River Delta); and
- The river flats area west of Lake Ohau Station Road is a Site and Area of Significance to Māori (**SASM**) (Lake Ōhau and Te Awa Āruhe).



Figure 1: Indicative boundary of Lake Ohau Station at the head of Lake Ohau, on the true right bank of the Hopkins River within the Maitland Valley.

The philosophy at Lake Ohau Station is to maintain as much of its land as possible as an operational farm. However, the economic realities which apply to its farming activities, combined with restrictions on the operation due to the natural values which apply to the site, means LOSL is investigating how the property and the activities undertaken on it could be reconfigured to make the operation more financially viable and able to suitably protect the natural values attributed to the property.

As a result, Lake Ohau Station has a strong interest in the Waitaki District Plan review and is keen to engage with the Council over the coming months on how the proposed provisions can provide for the sustainable development of its property.

Key points of interest that we would like to discuss with council further include:

- The ONL status attributed to the entire property;
- Provision for the efficient day to day operational requirements of Lake Ohau Station;
- Provision for the reconfiguration of land use within the Station where this can achieve improved farming efficiencies whilst maintaining or enhancing its landscape and ecological values; and
- Provision for further accommodation / tourism development.

Each is addressed below.

The Outstanding Natural Landscape Status

Under the Operative District Plan much of LOS is attributed ONL status, however the gently contoured flat terraces closer to the lake which contain the Homestead, the Quarters, and various pastoral farming areas are exempt.

The Draft Plan changes this situation and attributes the entire Lake Ohau Station property (including the flat terraces) ONL status. This is obviously of significant concern to LOSL due to the potential impact on the ability to operate and develop the Station.

In that respect, LOSL queries the change in ONL classification which applies to the flat terraced area and request Council's landscape experts reassess the classification which applies to this piece of land.

Day to Day Farm Operations

Operating a functional high-country station at this property necessitates:

- Maintaining long standing areas of improved pasture by:
 - Periodic clearance of re-generating and wilding vegetation (including weed species and manuka); and
 - Regular over sowing and topdressing;
- Pest control for various invertebrates, including rabbits, possums, deer and thar;
- Removal of wilding pines;
- Maintaining and replacing existing farm tracks, and establishing new ones;
- Maintaining and replacing existing fencing, and establishing new fencing, including in some cases, reinstating or establishing new farm tracks alongside existing fence lines for efficiency and health and safety reasons;
- Establishing shelterbelts; and
- Maintaining existing and establishing new farm buildings.

Collectively these activities mean vegetation clearance and earthworks are an essential part of the Station's operation. The maintenance of existing and establishment of new buildings and structures is also needed.

Whilst the Draft Plan makes primary production a permitted activity at the Station, the practical realities of undertaking the activities set out above mean a resource consent would need to be obtained under the Draft Plan as a non-complying activity to authorise the Station's routine operations due to:

- The Draft Plan requiring a resource consent be obtained as a non-complying activity for all earthworks at Lake Ohau Station which are not associated with the repair and maintenance of existing tracks and fences below 900m above sea level;¹
- The Draft Plan requiring a resource consent be obtained to clear any indigenous vegetation at Lake Ohau Station, including patches of regenerating manuka in areas of improved pasture;² and
- The Draft Plan requiring a resource consent be obtained for all new buildings and structures (excluding fences) at Lake Ohau Station, including farm buildings and structures, because the whole property is within an ONL.³

LOSL would like to discuss this rule framework with council and in particular whether there is a more efficient, effective and flexible means of regulating farm activities through permitted activity rules.

LOSL also seeks that the District Plan objectives and policies appropriately recognise and provide for the fact that:

- Operating a high country station like Lake Ohau Station will necessitate these types of activities occurring in areas attributed significant natural values; and
- In many ways the high country farming operation undertaken at the Station has created, and is complementary to, the landscape values currently attributed to the area.

The concepts broached in Objective RURZ-O1 and Policy RURZ-P3 (set out below) are important aspects of the Draft Plan in that respect and LOSL would appreciate the opportunity to discuss their wording further.

RURZ-O1 Providing for primary production activities

Primary production activities are provided for, or enabled while minimising, or where appropriate, avoiding, impacts on important ecological, cultural and landscape values for the District.

¹ Rule NFL-R4, Rule SASM-R4

² Rule NFL-R10, Rule SASM-R4

³ Rule NFL-R1, Rule SASM-R2

RURZ-P3 Integration of primary production with natural and cultural values

Recognise the importance of the landscape, heritage, biodiversity and mana whenua values of the high country and Rural Scenic Landscapes, and provide for continued primary production in these areas while managing any adverse effects on the values.

Reconfiguration of Land Use

Lake Ohau Station comprises areas of improved pasture, regenerating scrub, native grasslands and native bush. As outlined above, Lake Ohau Station has commenced a work programme to investigate how the property and the activities undertaken on it could be reconfigured to make the operation more financially viable whilst suitably protecting the natural values attributed to the property. The outcome of this may be that a different configuration of the above activities within the Station boundaries may yield win win solutions for the Stations farming activities and the environment.

LOSL seeks that the new District Plan not unnecessarily prevent this type of reconfiguration from being authorised, accepting that it will inevitably require resource consent due the indigenous vegetation clearance involved.

A key aspect of this is that the District Plan objectives and policies contemplate the clearance of indigenous vegetation for this purpose and use of biodiversity offsets to achieve a no net loss outcome.

As drafted LOSL is concerned that there is no clear pathway for this type of reconfiguration to occur within the objectives and policies of the Draft Plan. Policy ECO-P2 and Policy ECO – P5 for example could be interpreted as preventing this type of activity. Explicit policy direction which outlines the circumstances when this type of reconfiguration could occur may be one means of providing certainty to all stakeholders on what is contemplated.

Accommodation Development

LOSL have identified that an important aspect of reconfiguring the activities undertaken on the Station to make it financially viable to operate will be generating additional income and / or releasing equity through further subdivision or development of the site.

We have sought advice from Frank Boffa, a renowned landscape architect, on how this could be achieved whilst suitably respecting and protecting the landscape values attributed to the Station. It is Mr Boffa's opinion that a comprehensively planned, developed and managed village like development containing 25 – 30 units in the area which currently contains the Quarters would be an appropriate form of development in this environment. This area also has the advantage of not containing any significant ecological values. Figures 2 and 3 below show this area.

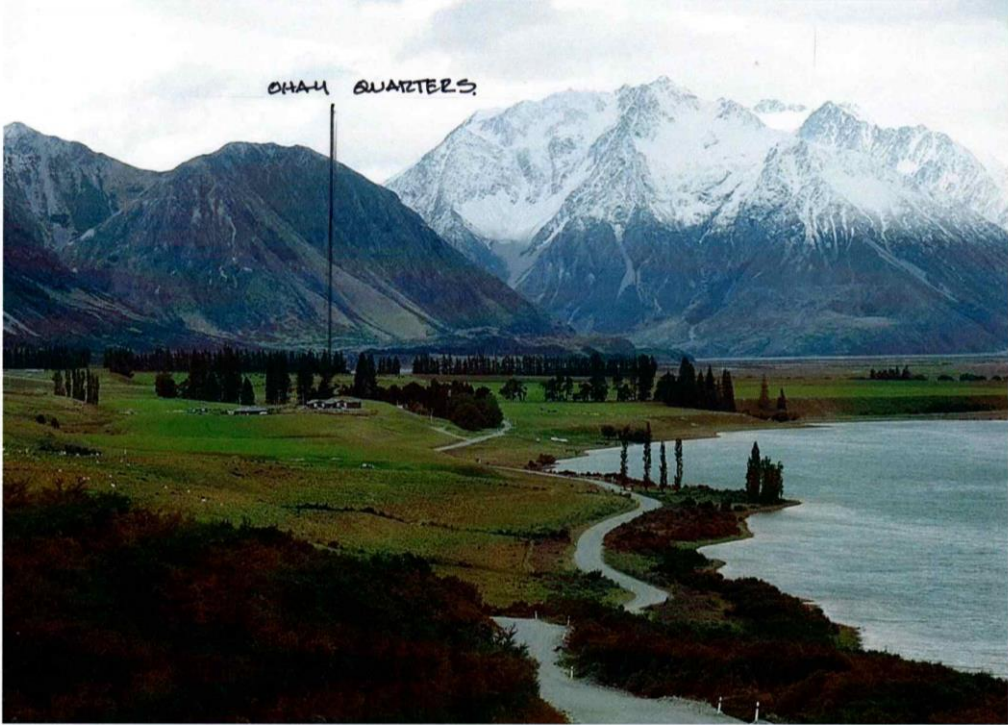
LOSL would like to discuss with council how development of this type could be appropriately recognised and provided for in the new District Plan. At present it is contemplated that a precinct may be an appropriate planning mechanism of providing for this type of development.



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1:5,000 @ A3
Data Sources: Eagle Technology LINC, StaraNZ, NZMA, Natural Earth,
© OpenStreetMap contributors, Eagle Technology, Land Information
New Zealand, GEBCO, Community maps contributors
Projection: NZGD 2000 New Zealand Transverse Mercator
GENERAL AREA IDENTIFIED Lake Ohau Aerial
AS BEING SUITABLE FOR A PLANNED
VILLAGE LIKE DEVELOPMENT. F. BOFFA
Date: 18 November 2021 | Revision: 0
NOV. 2021

FIGURE 5.

Figure 2: Aerial view of the Ohau Quarters area identified by Frank Boffa as being suitable for further village like development.



OHAIU QUARTERS DEVELOPMENT AREA

FIGURE 7.

Figure 3: View of the proposed development area from Lake Ohau Road.

If you have any questions or would like us to expand on any matter set out above please contact the undersigned. LOS: looks forward to working with Council over the coming months on this matter.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'A. Low', written in a cursive style.

Adrian Low
Mitchell Daysh Ltd

