

DDPR_feedback_0411s	
Name	Bridget Irving
Organisation	Killermont Station Limited
Email	[REDACTED]
Response Date	Aug 31 22 10:50:32 am
Notes	Killermont Station Limited
Q1	Select the chapter you want to provide feedback on
	Part 1 - Introduction and General Provisions
Q2	In general, to what extent do you support the contents of this chapter?
	Strongly oppose
Q3	Objective/Policy/Rule/Standard reference:
	Definition of Agricultural Intensification
Q4	Feedback/Comments
	<p>This definition is extremely wide ranging and uncertain. It simply requires 'a change' in pastoral activities. It is unclear how the definition fits together. How do you change a feed type without cultivation? The concern is that significantly more consents will be required when the activity that is being sought to be controlled is really a move from non-irrigated agriculture to irrigated agriculture. The definition should be refocused to this.</p> <p>There is also a potential issue regarding the extent to which agricultural intensification would capture changes between primary production types. For example – would someone need consent to develop horticulture under NFL-R5? Given the strategic direction in SD-RA-O1 the narrowest class of activities should be controlled.</p>
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_0413s	
Name	Bridget Irving
Organisation	Killermont Station Limited
Email	[REDACTED]
Response Date	Aug 31 22 11:07:14 am
Notes	Killermont Station Limited
Q1	Select the chapter you want to provide feedback on
	Natural Features and Landscapes
Q2	In general, to what extent do you support the contents of this chapter?
	Strongly oppose
Q3	Objective/Policy/Rule/Standard
	NFL-P3 and NFL-P4
Q4	Feedback/Comments
	<p>These two provisions are designed to manage ONL/F and RCL's being section 6 and section 7 landscapes. The provisions confer the same 'threshold' on both types which does not reflect their relative importance. If the level of maintenance to be afforded is the same, the differences in activity status under the rules has no basis.</p> <p>As most of these landscapes will be identified over rural land, consideration also needs to be given to how SD-RA-01 will be achieved.</p>
Q5	Objective/Policy/Rule/Standard
	NFL-P5
Q6	Feedback/Comments
	The terms used in this provision are synonymous requiring consideration of the same thing multiple times.
Q7	Objective/Policy/Rule/Standard
	New Provision required
Q8	Feedback/Comments
	There is no policy direction relating to agricultural intensification. Given that the rules control this activity (NFL-R5) policy direction would be useful when assessing applications for consent. The current provisions are so skeletal that it is difficult to determine what they are seeking to manage easily.
Q9	Objective/Policy/Rule/Standard
	NFL-R5
Q10	Feedback/Comments
	<p>Further consideration is required for this rule given the definitions of agricultural intensification and primary production. For example, does a move from pastoral to horticulture constitute 'intensification' and therefore breach the rule?</p> <p>If so, rules do not appear to implement Strategic Direction SD-RA-01.</p> <p>Activity status are unnecessarily restrictive within ONL/F and RCL's. Rural character landscapes are still rural landscapes and constitute a large swath of productive rural land within the District. To support SD-RA-01 activity status should be changed from Discretionary to Restricted Discretion so that the focus of a consent process is on the maintenance of amenity values rather than a broad and unidentified list of factors. This would better manage the tension between amenity values of RCL's and enabling productive use of rural land.</p> <p>Activity status within ONL/F should be changed from non-complying to discretionary. The section 104D test adds little to the assessment framework (particularly in light of the proposed policy framework) and a discretionary rules enable the full scope of matters to be considered and better manages the tension between landscape values and enabling productive use of rural land.</p>
Q11	Supporting documents?
Q12	If you need more space, or have other general comments, please leave them here

DDPR_feedback_0421s	
Name	Bridget Irving
Organisation	Killermont Station Limited
Email	[REDACTED]
Response Date	Aug 31 22 01:21:27 pm
Notes	Killermont Station Limited
Q1	Select the chapter you want to provide feedback on
	Appendices & Schedules
Q2	In general, to what extent do you support the contents of this chapter?
	Strongly oppose
Q3	Objective/Policy/Rule/Standard reference:
	Schedule - ONL-06 Omarama Flats
Q4	Feedback/Comments
	<p>The description of the ONL does not accurately capture the nature of the land within it. Particularly the land owned by Killermont Station Limited, known as Red Flat. Red Flat is not an agriculturally undeveloped dry grassland area. Red Flat has been fully developed for dry land cropping purposes. It has been fully fenced, stock water supplies installed, farm tracks etc. It is cropped on rotation to provide dairy support including the likes of Ryecorn, triticale and Lucerne. The site is very large and is influenced by different factors in different locations.</p> <p>The area of the site located along Broken Hut Road is more heavily influenced by the surrounding land uses, irrigated pasture, farm buildings, Tara Hills Research Station etc. This area of Red Flat is also highly modified itself including by the decommissioned airfield and associated buildings.</p> <p>Parts of the site do contribute to the ONL values of the wider area, particularly those adjacent to the State Highway. Development along Broken Hut Road is in the order of 1.5-2km from users of the state highway at similar elevation making it difficult to see as part of a much larger landscape (a significant proportion of which is classified as RCL).</p> <p>The boundary between the Omarama Flats ONL and surrounding RCL should be moved to the middle of Red Flat (running in parallel with the SH) so that it more accurately reflects the existing character of the site and better supports the ongoing use of the land for productive purposes in line with the strategic directions.</p>
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

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