

15 November 2021

Queenstown Lakes District Council  
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PO Box 201  
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New Zealand

Dear Queenstown Lakes District Council

[al.nz](http://al.nz)

### **Feedback on the Policy 6.3.3.3 Section 293 Proposal**

#### *Submission*

- 1 This submission is made on behalf of Kathryn Maree Woodfield and Vaughn Howard Woodfield (**Submitter**). The Submitter owns land at 216 Stevenson Road RD 2 Wanaka 9382 legally described as Lot 6 DP 325795 held in Certificate of Title 104103 (**Submitter Land**). The Submitter Land is included within the revised Clutha River / Mata Au Outstanding Natural Feature (**ONF**).
- 2 This submission relates to the s293 proposal to extend the application of Policy 6.3.3.3 to apply to ONFs in addition to Outstanding Natural Landscapes (**ONLs**), determined through Stage 1 of the Proposed Queenstown Lakes District Plan (**PDP**) (**Proposal**).
- 3 The parts of the Proposal this submission relates to are:
  - (a) The Proposal as it affects the Submitter Land;
  - (b) The Proposal as it may apply more broadly across the District's ONLs and ONFs; and
  - (c) The appropriate use of defined terms within the Proposal.

#### *Reasons for the submission*

- 4 The Submitter undertakes farming activities, as defined in the PDP, on the Submitter Land. Although these activities may be considered 'smaller scale' comparatively within the District, they still provide the Submitter with commercial return / are an efficient way to manage the land.
- 5 The Submitter supports the Proposal in principle. In particular, the Submitter supports the intention to recognise the importance of farming as an activity which may modify landscape within ONFs and to enable farming activities in a way that is consistent with protecting the values of ONFs.
- 6 The Submitter is concerned the drafting of Policy 6.3.3.3 may inadvertently exclude smaller-scale or marginally productive farms and considers it should be amended to expressly recognise all farming activities irrespective of their size, scale, viability and/or productivity. This amendment would be consistent with the RMA effects-based approach.
- 7 The Submitter is also concerned no definition has been provided for 'working farms' and considers the term should be removed in order to eliminate any ambiguity and inconsistency with the rest of the PDP.

*Decision sought*

8 The Submitter seeks the following relief:

- (a) That policy 6.3.3.3 be amended to recognise all farming activities as set out in **Appendix A** to this submission; and
- (b) Any additional, further or consequential relief to give effect to the matters raised in this submission.

Yours faithfully

**Anderson Lloyd**



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### **Appendix A – Amendment sought to Policy 6.3.3.3**

For ~~working farms~~ Farming Activities within Outstanding Natural Features and Outstanding Natural Landscapes:

- a. Recognise that ~~viable Farming involves Activities that~~ may modify the landscape; and
- b. Enable those activities in a way that is consistent with protecting the values of Outstanding Natural Features and Outstanding Natural Landscapes.