

RESOURCE MANAGEMENT ACT 1991

FORM 6

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED PLAN CHANGE 19 TO THE MACKENZIE DISTRICT COUNCIL

Clause 8 of Schedule 1, Resource Management Act 1991

To: Mackenzie District Council  
PO Box 52  
FAIRLIE

[planning@mackenzie.govt.nz](mailto:planning@mackenzie.govt.nz)

Name of persons making these further submissions:

- (1) Pukaki Tourism Holdings Limited (PTHL); and
- (2) Pukaki Quiet Zone Supporters (PQZS).

*Note – this is not a joint submission. It represents two submitters as detailed above.*

These are further submissions in partial support and partial opposition to a submission on proposed Plan Change 19 to the Mackenzie District Plan.

The further submitters are persons who has an interest in the proposal that is greater than the interest the general public has, the grounds for saying this being:

- (1) PTHL own land adjoining Lake Pukaki, are adversely affected by commercial motorised boat noise and are an original submitter in support of the plan change.
- (2) PQZS members also own land in close proximity to and adjoining Lake Pukaki, are adversely affected by commercial motorised boat noise and are an original submitter in support of the plan change.

PTHL and PQZS support in part and oppose in part the submission of:

H2 Explore Limited #158

The parts of the H2 Explores submission that PTHL and PQZS support or oppose are:

- (1) We support the submission to the extent that they support a prohibition of commercial motorised boating activities on Lake Pukaki in the areas coloured red and green attached to their submission.
- (2) We oppose the submission to the extent that they have requested commercial motorised boating activities be a permitted activity on the balance of the lake (the area coloured yellow on the plans attached to their submission).

(Please clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal and continue on an additional page if necessary)

The reason for PTHL and PQZS support is:

The submitter has recognised that commercial boating activities are having adverse effects on the amenity of the Lake Pukaki environment and should be managed by the Council. We therefore support their requested prohibition of the red and green areas attached to

their submission. We maintain such a prohibition should extend to the entire lake for the same reason.

The reason for PTHL and PQZS opposition is:

The concept of zoning the lake and controlling the type and nature of boating activities through different water zones on the lake is, in our opinion, inefficient and ineffective.

The main problem with the proposal is how does the Council enforce boating activities on undefined water zones. In our opinion it would almost be impossible for users of the lake to know when they are in or outside a zone.

We also submit that the zones are arbitrary drawn and amenity effects (as they have recognised in their submission that such exist) transcend those zone boundaries. Other submitters have commented that the hovercraft can be heard at distances of up to 6 kilometres away. That is certainly our experience as well. The proposed zones will therefore be ineffective in managing the effects of noise on the amenity values of the Lake Pukaki area.

We therefore oppose this aspect of the submission. We instead remain supportive of the Council's proposal to prohibit all commercial motorised boating activities on Lake Pukaki.

PTHL and PQZS seek that H2 Explores submission be allowed in part and disallowed in part as follows:

- (1) Allowed to the extent that they support a prohibition of commercial motorised boating activities on Lake Pukaki in the areas coloured red and green attached to their submission.
- (2) Disallowed to the extent that they have requested commercial motorised boating activities be a permitted activity on the balance of the lake (the area coloured yellow on the plans attached to their submission).

PTHL and PQZS wish to be heard in support of their further submission.

If others make a similar submission, the submitters will consider presenting a joint case with them at a hearing.

Signature of person making Further Submissions:

Carey Vivian

For:

- (1) Pukaki Tourism Holdings Limited; and
- (2) Pukaki Quiet Zone Supporters.

Address for service of person making Further Submission:

Vivian Espie Limited  
P O Box 2514  
Wakatipu  
Queenstown 9349

Ph: 4414189  
Email: [carey@vivianespie.co.nz](mailto:carey@vivianespie.co.nz)

**FORM 6  
FURTHER SUBMISSION  
ON PROPOSED PLAN CHANGE 19  
CLAUSE 8 OF FIRST SCHEDULE RESOURCE MANAGEMENT ACT 1991**

To: Mackenzie District Council, PO Box 52, Fairlie 7949

Full name of person making further submission: Zita & Walter Speck

Address for service P.O. Box 2, 14 Pioneer Drive Lake Tekapo

Phone: 03/ 6806 774 0274 22 22 18 Fax/email: speck@xtra.co.nz

Contact person: Zita or Walter Speck  
*(name and designation, if applicable)*

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This is a further submission in support of (or in opposition to) a submission on:

**Plan Change 19 – Activities on or within Water Bodies**

We are:

person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category;

Resident for 35 years/ratepayers for 31 years.

Tourist operators, (accommodation/guiding) for over 31 years - with a solid knowledge of what residents and visitors want to experience in the Mackenzie.

We observe increasingly significant adverse negative effects of developments and activities which are detrimental to this area.

Above all the MDC shall not forget to put needs/wishes of the residents first.

A good place for residents will always be a good place for visitors!

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a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category;

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We support the submissions of:

Please see enclosed attachment (three pages)

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The particular parts of the submission I support (or oppose) are:

Please see enclosed attachment

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[clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal].

The reasons for my support / opposition are:

Please see enclosed attachment

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I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed):  
[give precise details].

Please see attachment

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I wish/ do not wish to be heard in support of my further submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

*Walter & Zita Speck*

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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.)

Date: Lake Tekapo, 4.5.2018

If you have any queries about this form or the proposed plan change or variation, please contact Karina Morrow, Group Manager Regulations Mackenzie District Council.

***Note to person making further submission***

*A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.*

Further Submission on proposed Plan Change 19

## Plan Change 19 – Activities on or within Water Bodies

### 1. We support the submission (following submissions) of:

Submission # 1, Bronwyn Murray, Lake Tekapo	thewolds@farmside.co.nz
Submission # 22, David & Hilary Allen, Christchurch	davehilary554@gmail.com
Submission # 48, Kate Ivey, Twizel	
Submission # 49, Mark Ivey, Pukaki	
Submission # 93, Anthony Honeybone, Christchurch	anthony.honeybone@xtra.co.nz
Submission # 98, Helen Ivey, Aoraki Mt. Cook	helen@glentanner.co.nz
Submission # 105, Gregory Miller, Christchurch	goober_uk2000@yahoo.com
Submission # 106, Megan Simmonds, Christchurch	meganjane_69yahoo.co.uk
Submission # 107, Penny & Martin Murray, Lake Tekapo	penny@maryburn.co.nz
Submission # 109, Sally Miller, Christchurch	
Submission # 110, George Ivey, Mt. Cook	georgeivey@lincolnuni.ac.nz
Submission # 111, Duncan Mackenzie, Timaru	brae-mac@xtra.co.nz
Submission # 114, Marion Seymour,	
Submission # 119, Ross Ivey, Aoraki Mt. Cook	glentanner@xtra.co.nz
Submission # 120, Braemar Station, Lake Tekapo	braemarstation@farmside.co.nz
Submission # 133, Jack Torrie, Lake Tekapo	
Submission # 134, Jonty Wylaars, Lake Tekapo	jonty.wylaars@gmail.com
Submission # 139, James George Murray, Timaru	<a href="mailto:glenmorestation@xtra.co.nz">glenmorestation@xtra.co.nz</a>
Submission # 142, Richard & Nicola McKerchar, Omarama	rn.mckerchar@hotmail.com
Submission # 146, Gregory Knowles, Rolleston	greg@knowlesnz.com
Submission # 147, Tim & Penny Rayward, Lake Tekapo	timrayward@gmail.com
Submission # 157, Nicole & Angus Lang, Fairlie	angus.nicole@hotmail.com
Submission # 163, John Murray, Lake Tekapo	thewolds@farmside.co.nz

### Particular parts of the submission we support are:

Allow recreational/non-commercial motorboats/watercraft activities on Lake Pukaki

### The reason for our support are:

It has been a right of residents to do boating on the lake – this right must be protected  
There were never any complaints, disturbances created or any visual or noise pollution on the lake before the start-up of the Hovercraft.  
Lake Pukaki, Lake Tekapo, Lake Opuha should all be treated the same.  
Certain criteria shall be applied in regards to noise, size etc. We suggest a noise level equivalent to Res1&2 noise restrictions.

### We seek that the following part of the submission be allowed:

Use of recreational/non-commercial motorboats/activities on Lake Pukaki being allowed.

**2. Further we support the submission (following submissions) of:**

Submission # 19, Beverly Wynyard, Whangamata,	waikiekie@hotmail.com
Submission # 21, Olwen Mason, Wellington	olwen.mason@gmail.com
Submission # 23, Susan Hall, Darfield	smahall@xtra.co.nz
Submission # 24, Jenny Rowcliffe, Singapore	jenrow@mac.com
Submission # 25, Wayne Price, Brisbane, A	waynep108@gmail.com
Submission # 28, Femke van Booren, NL	femkevanbooren@hotmail.com
Submission # 29, Tamara Waite, Twizel	tbaeva@gmail.com
Submission # 30, Graham Townsend, Christchurch	newptc75@gmail.com
Submission # 32, Sharon O'Brien, Auckland	sharon_108@icloud.com
Submission # 34, Naut Fick, NL	N_fick@hotmail.com
Submission # 35, Rex, Gibson, Christchurch	rnjg@xtra.co.nz
Submission # 36, Sophie Bosch, NL	s.bosch88@gmail.com
Submission # 37, Daryl Robertson	djrobbo108@gmail.com
Submission # 38, Stephanie Hagen, Lake Tekapo	stay@laketekapolodge.co.nz
Submission # 39, Val Parmenter, Nelson	parameters@kinect.co.nz
Submission # 40, Ethan Gabriel, Twizel	ethangabriel108@yahoo.com
Submission # 41, Sita Wills, Hawea	sita_wills@yahoo.com.au
Submission # 42, Wernette Patrick, F	pat.wernette@wanadoo.fr
Submission # 43, Susan Norton, Twizel	suenorton7700@gmail.com
Submission # 44, Marion Gould, Lake Tekapo	guidehill@xtra.co.nz
Submission # 45, Gary Small, US	tours@xtctours.com
Submission # 50, Juliet Collins, Wynnum, A	julietacollins@hotmail.com
Submission # 51, I Crombie, Christchurch	woshannah@hotmail.com
Submission # 56, Shastra Coppolaro, Brisbane, A	shastra2000@gmail.com
Submission # 58, Mark Catchpole, Pottsville Beach, A	mrc108@iinet.com.au
Submission # 60, Alexandra Jones, Pottsville Beach, A	kadamba@iinet.com.au
Submission # 65, Brenda Reading, Oamaru	reading72@gmail.com
Submission # 66, Brendon Dobbs, US	damondobbs@hotmail.com
Submission # 68, Patricia Jowett, Lower Hutt	ljowett@gmail.com
Submission # 69, Lake Pukaki Natural Quiet Zone Supporters, Twizel	info@pukakiquietzone.org
Submission # 70, Bruce Martin, Lake Tekapo	bruceandlynm@yahoo.co.nz
Submission # 71, Sara Leadbetter, Kingston	
Submission # 79, Nelson-Tasman Branch, Forest & Bird	nelsontasman.branch@forestandbird.org.nz
Submission # 81, Julia Patton, UK	julia.paton30@gmail.com
Submission # 83, Mary Hobbs, Aoraki Mt Cook	nzoutside@xtra.co.nz
Submission # 84, Bronwyn Bowen, Timaru	paulandbronny@xtra.co.nz
Submission # 85 Bhavani Paulraj, Massey	
Submission # 86 David Fisher, Twizel	dlfisher@xtra.co.nz
Submission # 87, Charlie Hobbs, Aoraki Mt Cook	mountcook@xtra.co.nz
Submission # 88, Mark Campbell	mark.markcampbell@gmail.com
Submission # 89, Jacqueline Lyttle, Whenuapai	radlnd@xtra.co.nz
Submission # 90, Bridget Winstone, Auckland	biddywinstone@gmail.com
Submission # 91, Adrien Lefebvre, Christchurch	adrien@slingshot.co.nz
Submission # 92, Michael & Elaine Lindsay, Twizel	omahauhill@gmail.com
Submission # 100, Krista Curin, Twizel	kristacur@yahoo.com
Submission # 101, Elaine Curin, Twizel	elainecurinhere@hotmail.com

Submission # 108, Justin Cheney, Currumbin, A	justinchene34@gmail.com
Submission # 124, Roberto Budini, Coolangata, A	giigarage@yahoo.com.au
Submission # 126, Jenny Campbell, Mossburn	jennycam@xtra.co.nz
Submission # 128, Dennis Viehland, Lake Tekapo	dviehland@gmail.com
Submission # 137, Jennifer Ensor, Timaru	jenny.ensor21@gmail.com
Submission # 141, Anna Bacchus, Twizel	anne@lakestone.co.nz
Submission # 145, Tony Stewart, Christchurch	info@photoshots.co.nz
Submission # 149, Virginia Barker, Twizel	ginbarker@gmail.com
Submission # 150, Jaia Curin, Twizel	jc.findlay@outlook.com
Submission # 151, Barry Mitford-Burgess, Timaru	barryjmburgess@hotmail.com
Submission # 152, Erin Mitford-Burgess, Timaru	erinjmburgess@gmail.com
Submission # 154, Mike Bacchus, Twizel	mike@lakestone.co.nz
Submission # 161, Sudama Pabian, Varisty Lakes, A	sudamapabian@gmail.com

**Particular parts of the submission we support are: highlighted in yellow**

As noise control is not addressed by Plan Change 19, amend District Plan Section 14, Clause 2.3.4 Watercraft Noise to reflect the special character of the Mackenzie Lakes. Noise levels should be as “Quiet Natural Noise”, 30dBA. Noise levels to apply to all craft

**The reason for our support are:**

It is important to protect the “Natural Quiet” and the natural sounds in the Mackenzie – this, together with the beauty, the cleanliness, the ambience of the High Country, the relatively unspoilt vistas by day and night, represent the biggest assets of this area.

Those assets will become increasingly more valuable in our modern, urbanised world.

Noise pollution has been overlooked in the past. It is important to set noise levels on all waterways (and on land) in the Mackenzie – noise levels which can be measured, checked and controlled. Noise control must be implemented as quickly as possible! (Not later than springtime 2018)!

Short-term financial gain should not come at the expense of the long-term benefits to the area and the residents.

**A compromise may be the best outcome, as 30 dBA would hardly allow the use of a motorised watercraft. Decibel levels could be set around the same guidelines as for residential areas.**

We strongly believe Lake Tekapo, Lake Pukaki, Lake Opuha should be treated the same.

Traditionally all 3 lakes are very popular for recreational water sport, incl. motorised watercraft. This activities should still be allowed, but controlled with noise and size restrictions.

**We seek that the following part of the submission be allowed: highlighted in yellow**

As noise control is not addressed by Plan Change 19, amend District Plan Section 14, Clause 2.3.4 Watercraft Noise to reflect the special character of the Mackenzie Lakes. Noise levels should be as “Quiet Natural Noise”, 30dBA. Noise levels to apply to all craft.

**3. 1. We support the submission (following submissions) of**

Submission #164, Michael Aldo Speck

**Particular parts of the submission we support are:**

**We support the whole submission**

**Please take note, for practical reasons, as a lot of the listed submissions had the same sentence, we have chosen a few, highlighted them and we shall serve them with this submission per email.**





Department of Conservation  
*Te Papa Atawhai*

DOC DM-5472121

4 May 2018

Mackenzie District Council  
PO Box 52  
Main Street  
Fairlie  
7949

Attention: Karina Morrow

Dear Karina,

**Further Submission – Plan Change 18 and Plan Change 19 – Mackenzie District Plan**

Please find enclosed the further submission by the Director-General of Conservation in respect of Plan Change 18 and Plan Change 19.

Please contact Nardia Yozin in the first instance if you wish to discuss any of the matters raised in this submission (03 363 1665, 027 502 3129 or via [nyozin@doc.govt.nz](mailto:nyozin@doc.govt.nz)).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sally Jones'.

Sally Jones  
Operations Manager  
Department of Conservation  
Te Manahuna / Twizel District, Eastern South Island

Department of Conservation *Te Papa Atawhai*  
Christchurch Shared Services  
Private Bag 4715, Christchurch Mail Centre, Christchurch 8140, New Zealand  
[www.doc.govt.nz](http://www.doc.govt.nz)

RESOURCE MANAGEMENT ACT 1991

FORM 6  
FURTHER SUBMISSION IN SUPPORT OR OPPOSITION TO, SUBMISSION ON PUBLICLY  
NOTIFIED  
PROPOSED PLAN CHANGES 18 and 19 – Mackenzie District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

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**TO:** Mackenzie District Council

**FURTHER SUBMISSIONS ON:** Plan Changes 18 and 19

**NAME:** Lou Sanson  
Director General of Conservation

**ADDRESS:** RMA Shared Services  
Department of Conservation  
Private Bag 4715  
Christchurch Mail Centre 8140  
Attn: Nardia Yoizin

**STATEMENT OF SUBMISSION BY THE DIRECTOR GENERAL OF CONSERVATION**

This is a further submission in support of (or in opposition to) a submission on Proposed Plan Changes 18 and 19 of the Mackenzie District Plan.

I, Sally Jones, Operations Manager, Twizel of the Department of Conservation, acting under delegated authority from the Director General of Conservation, make the following further submissions in support or opposition to the submissions on Proposed Plan Changes 18 and 19.

1. **I support or oppose the submissions of those persons and/ or organisations listed in the second column headed "Submitter Name" of the table in the attached.**
2. **The particular parts of the submission I support or oppose are identified in the third column headed "Submission".**
3. **The reasons for my support or opposition are set out under the fifth column headed "Reasons" of the table.**
4. **The particular aspect of the Plan that the further submission relates to are: set out in the first column headed "Plan Reference".**
5. **In relation to those submissions I support I seek that that submission is allowed.**
6. **In relation to those submissions I oppose I seek that the part of the submission I oppose is disallowed.**

7. I do wish to be heard in support of this submission.
8. If others make similar submissions I will consider presenting a joint case with them at the hearing.



Sally Jones  
Operations Manager  
Twizel, Eastern South Island

Pursuant to delegated authority  
On behalf of  
Lou Sanson  
Director-General of Conservation

Date: 4 May 2018

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011.

PLAN REFERENCE	SUBMITTER NAME	SUBMISSION	SUPPORT/ OPPOSE	REASONS
General Submission on PC18	#2 Maryburn Station	<i>Council in consultation with individual landowners should identify "significant Indigenous Vegetation"</i>	Oppose	<p>The Canterbury Regional Policy Statement (CRPS) sets out clear criteria for how significant indigenous biodiversity should be identified. All biodiversity which meets the criteria should be considered significant.</p> <p>The criteria contained in the CRPS also sets out that this determination should be undertaken by a suitably qualified ecologist.</p> <p>The outcome which Maryburn Station is seeking is inconsistent with the CRPS.</p> <p>This is not a matter for the District Plan.</p>
General Submission on PC18	#2 Maryburn Station	<i>Mackenzie District council needs to acknowledge how land owners are going to compensated financially for "loss of land", given the benefits to the wider public, through constant Plan Changes.</i>	Oppose	
General Submission on PC18	#8 Canterbury Regional Council (Environment Canterbury)	<i>The Regional Council seeks that the objectives and policies are rewritten to clarify – That indigenous vegetation is a significant component of the outstanding natural landscape in the Mackenzie Basin.</i>	Support	<p>Biodiversity values contribute to the Outstanding Natural Landscape (ONL) in the Mackenzie Basin. There needs to be some direction in the policy framework recognising these linkages and for where biodiversity values contribute to ONL – it is considered as part of a resource consent.</p>
General Submission on PC18	#8 Canterbury Regional Council (Environment Canterbury)	<i>The Regional Council seeks that the objectives and policies are rewritten to clarify – the policy approach that will be taken to listing further "sites of natural significance" in the District Plan</i>	Support	<p>The D-G is also concerns that the current list of SONS appears to be static. While it is noted that the Matters of Discretion (MOD) in the rules as well as the Farm Biodiversity Plans seek to identify sites which meet the criteria, it is not clear how these sites, once identified will be treated by the plan framework if they are not an identified SONS in the planning maps.</p>
General Submission on PC18	#8 Canterbury Regional Council (Environment Canterbury)	<i>The Regional Council seeks that the objectives and policies are rewritten to clarify – the policy approach to sites of geological or geomorphological significance</i>	Support	<p>The D-G's original submission sought to include these sites in the MODs. However, a policy framework to provide direction on the management of effects of activities on these sites will improve consistency with the CRPS.</p> <p>If it is not intended that these sites are addressed in PC18, then some indication of where these sites will be managed in the plan is necessary.</p>

General Submission on PC18	#9 Environmental Defence Society (EDS)	<p><i>Failure to take an integrated approach to protecting ONL and ecological/ biodiversity values..</i></p> <p><i>Insert a new policy recognising the overlap between ONL and Biodiversity Values</i></p> <p><i>Amend the assessment criteria and Appendix Y to provide for consideration of landscape effects...</i></p> <p><i>Mapping of all SONS, including mapping of the Mackenzie Basin's remaining contiguous/ connected area of biodiversity (and geomorphological landscape) value as a SONS.</i></p>	Support	<p>Biodiversity values contribute to the Outstanding Natural Landscape (ONL) in the Mackenzie Basin. There needs to be some direction in the policy framework recognising these linkages and for where biodiversity values contribute to ONL – it is considered as part of a resource consent.</p>
General Submission on PC18	#9 Environmental Defence Society (EDS)	<p><i>Genesis is of the understanding that both PC18 and PC19 have been prepared as part of a staged review of the District Plan. Undertaking a staged review does not adequately enable resource users to consider, in an integrated way, how plan provisions may affect them overall...</i></p>	Support in part	<p>The D-G is concerned that effects on significant indigenous biodiversity which hasn't met the criteria may not be managed appropriately in the plan. It is important that those sites which meet the criteria, but aren't mapped are also protected.</p> <p>The D-G agrees that a staged plan approach can make it difficult to understand how an activity may be managed where that activity may be covered by or fall under rules in different parts of the Plan. While the D-G prefers a district wide objective, policy and rule framework to manage indigenous vegetation, a staged review process can raise issues with consistency when later stages are reviewed.</p>
General Submission on PC18	#11 Genesis	<p><i>(c) ...PC18 rules should give greater weight to the voluntary formulation of Farm Biodiversity Plans (FBP), particularly with respect to integrating development with the sustainable management and long-term protection of indigenous vegetation Values (i.e. policy 8 and 9).</i></p> <p><i>(d) We submit that the approval of voluntary FBPs, as a protection method, should be enabled without necessarily having to clear indigenous vegetation. In other words, the approval of a FBP should be seen as a positive long-term management tool in itself, not just a reactive process that a landowner has to go through should they wish to apply for resource consent to clear indigenous vegetation.</i></p>	Oppose	<p>The D-G supports the use of FBP as part of a comprehensive resource consent for vegetation management. Any FBP should address the concerns raised by the D-G's original submission and this further submission.</p>
General Submission on PC18	#15 Pukaki Tourism Holdings Ltd	<p><i>(d) We submit that the approval of voluntary FBPs, as a protection method, should be enabled without necessarily having to clear indigenous vegetation. In other words, the approval of a FBP should be seen as a positive long-term management tool in itself, not just a reactive process that a landowner has to go through should they wish to apply for resource consent to clear indigenous vegetation.</i></p>	Oppose	<p>It is the D-G's understanding that FBPs are intended to manage vegetation clearance across a whole farm property. The D-G's position on the use of FBPs is outlined in the D-G's original submission and the use or approval of any FBP must be through a resource consent process.</p>

<p>General Submission on PC18</p>	<p>#15 Pukaki Tourism Holdings Ltd</p>	<p><i>(e) We also submit that the approval of voluntary FBPs should not necessarily need to be a resource consent. The Council could instead simply certify a FBP that meets the criteria on Appendix Y, to which the indigenous rules could then apply. A similar certification process exists for Ground Level in the Queenstown-Lakes District Plan to aid the implementation of rules.</i></p>	<p>Oppose</p>	<p>FBP should not be used as a proxy for the permitted activity. The approach proposed by Pukaki Tourism Holdings Ltd provides no certainty for the protection of indigenous vegetation which meets the criteria in the CRPS or for the maintenance of indigenous biodiversity. There is also no ability for the council to ensure that the FBP in being implemented properly, or that any changes are managed appropriately.</p>
<p>General Submission on PC18</p>	<p>#16 Mt Gerald Station</p>	<p><i>2.5 the proposed provisions do not adequately take account of the tenure review process of the controls on pastoral intensification and agricultural conversion introduced by PC14 particularly on the concept of FBA... Properties that have been through tenure review have been subject to rigorous assessment and areas of significant inherent value, including biodiversity/ecology, landscape and conservation are either identified and either returned to the Crown/ DOC or protected through conservation covenants on any land freehold. The proposed provisions must be viewed in context alongside large tracts of conservation lands that is already protected and other planning restrictions already in place.</i></p>	<p>Oppose</p>	<p>This is incorrect. Tenure review is a separate process and does not override the purpose of the RMA. PC13 focused on Landscape values – particularly effects on ONLs. Biodiversity is a function of the District council and should be managed through the district plan. Land tenure (Crown or freehold) should not dismiss the need for the RMA to apply.</p>
<p>General Submission on PC18</p>	<p>#17 The Wolds Station</p>	<p><i>2.5 the proposed provisions do not adequately take account of the tenure review process of the controls on pastoral intensification and agricultural conversion introduced by PC14 particularly on the concept of FBA... Properties that have been through tenure review have been subject to rigorous assessment and areas of significant inherent value, including biodiversity/ecology, landscape and conservation are either identified and either returned to the Crown/ DOC or protected through conservation covenants on any land freehold. The proposed provisions must be viewed in context alongside large tracts of conservation lands that is already protected and other planning restrictions already in place.</i></p>	<p>Oppose</p>	<p>This is incorrect. Tenure review is a separate process and does not override the purpose of the RMA. PC13 focused on Landscape values – particularly effects on ONLs. Biodiversity is a function of the District council and should be managed through the district plan. Land tenure (Crown or freehold) should not dismiss the need for the RMA to apply.</p>

General Submission on PC18	#19 Blue Lake Investments NZ Limited	<p>(c) ...PC18 rules should give greater weight to the voluntary formulation of Farm Biodiversity Plans (FBP), particularly with respect to integrating development with the sustainable management and long-term protection of indigenous vegetation Values (i.e. policy 8 and 9).</p>	Oppose	The D-G supports the use of FBP as part of a comprehensive resource consent for vegetation management. Any FBP should address the concerns raised by the D-G's original submission and this further submission.
General Submission on PC18	#19 Blue Lake Investments NZ Limited	<p>(d) We submit that the approval of voluntary FBPs, as a protection method, should be enabled without necessarily having to clear indigenous vegetation. In other words, the approval of a FBP should be seen as a positive long-term management tool in itself, not just a reactive process that a landowner has to go through should they wish to apply for resource consent to clear indigenous vegetation.</p>	Oppose	It is the D-G's understanding that FBPs are intended to manage vegetation clearance across a whole farm property. The D-G's position on the use of FBPs is outlined in the D-G's original submission and the use or approval of any FBP must be through a resource consent process.
General Submission on PC18	#19 Blue Lake Investments NZ Limited	<p>(e) We also submit that the approval of voluntary FBPs should not necessarily need to be a resource consent. The Council could instead simply certify a FBP that meets the criteria on Appendix Y, to which the indigenous rules could then apply. A similar certification process exists for Ground Level in the Queenstown-Lakes District Plan to aid the implementation of rules.</p>	Oppose	FBP should not be used as a proxy for the permitted activity. The approach proposed by Blue Lake Investments NZ Limited provides no certainty for the protection of indigenous vegetation which meets the criteria in the CRPS or for the maintenance of indigenous biodiversity. There is also no ability for the council to ensure that the FBP in being implemented properly, or that any changes are managed appropriately.

General Submission on PC18	#14 Opuha Water Limited	Submission in its entirety. Including submission on Chapter 12 Rules, Definitions and proposed PC18.	Oppose	<p>What is intended to be covered by the proposed submission is very broad and encompassing. The terminology and rule framework sought goes too far in permitting activities to occur unchecked with little consideration of the significant effects on indigenous biodiversity. The D-G is also concerned that the proposed amendments by Opuha Water Limited seek to have non-energy related activities to be treated the same as the Waitaki Power Scheme – which is more confined in what activities are occurring where with less ability for excessive expansion outside water bodies and their margins. The proposed amendments by Opuha Water Limited are inappropriate and do not give effect to the CRPS, nor s6 of the RMA. If Opuha Water Limited consider that specific rules are needed to cover their activities, specific rules should be drafted which reflect the array of activities being undertaken by Opuha Water Limited and the effects of these activities on biodiversity. Furthermore, the amendments sought by Opuha Water Limited appear to go further than the activities covered in the District Plans Opuha Dam Special Purpose Zone.</p>
PC18: Definitions	#8 Canterbury Regional Council (Environment Canterbury)	Amend the definition of "Improved Pasture" 4. <i>Introduce a threshold (for example X area per Y area per 5 years) for clearance of indigenous vegetation within improved pasture as a permitted activity...</i> 5. <i>amend the rules to make clearance of indigenous vegetation within areas of improved pasture a controlled activity.</i>	Oppose	<p>The D-G does not support the use of area ratios for clearance as this leads to significant losses of indigenous vegetation over time and little influence in maintaining indigenous biodiversity.</p>
PC18: Definitions	#8 Canterbury Regional Council (Environment Canterbury)		Support in Part	<p>While the D-G supports a controlled activity status (rather than permitted), the issue of how improved pasture is identified (as raised in the D-G's submission) is still valid.</p>
PC18: Definitions	#16 Mt Gerald Station	Insert new definition for "Introduced Vegetation" <i><u>Introduced Vegetation means a plant community where species introduced into New Zealand dominate and comprise between 66% to 100% ground cover.</u></i>	Oppose	<p>The use of ratios is problematic for a lay person to determine. Additionally, the vegetation types in the basin are not present as all times of the year and coverage of indigenous or exotic species may change throughout the year. The Mackenzie Basin is home to very rare and threatened plant species. Protection of these species cannot occur if their presence is ignored as they are surrounded by exotic species. The D-G considers that this approach proposed by Mt Gerald Station is over complicated and does not provide appropriate protection of significant indigenous biodiversity nor does it provide for biodiversity maintenance.</p>



PC18: Definitions	#17 The Wolds Station	Insert new definition for "Introduced Vegetation" <u>Introduced Vegetation means a plant community where species introduced into New Zealand dominate and comprise between 66% to 100% ground cover.</u>	Oppose	<p>The use of ratios is problematic for a lay person to determine. Additionally, the vegetation types in the basin are not present as all times of the year and coverage of indigenous or exotic species may change throughout the year. The Mackenzie Basin is home to very rare and threatened plant species. Protection of these species cannot occur if their presence is ignored as they are surrounded by exotic species. The D-G considers that this approach proposed by The Wolds Station is over complicated and does not provide appropriate protection of significant indigenous biodiversity nor does it provide for biodiversity maintenance.</p>
PC18: Definitions	#16 Mt Gerald Station	Insert new definition for "Mixed Vegetation" <u>Mixed Vegetation means a plant community comprised of species both native to New Zealand, and the ground cover of each group of species comprising between 33% to 66% ground cover of the total area.</u>	Oppose	<p>The use of ratios is problematic for a lay person to determine. Additionally, the vegetation types in the basin are not present as all times of the year and coverage of indigenous or exotic species may change throughout the year. The Mackenzie Basin is home to very rare and threatened plant species. Protection of these species cannot occur if their presence is ignored as they are surrounded by exotic species. The D-G considers that this approach proposed by Mt Gerald Station is over complicated and does not provide appropriate protection of significant indigenous biodiversity nor does it provide for biodiversity maintenance.</p>
PC18: Definitions	#17 The Wolds Station	Insert new definition for "Mixed Vegetation" <u>Mixed Vegetation means a plant community comprised of species both native to New Zealand, and the ground cover of each group of species comprising between 33% to 66% ground cover of the total area.</u>	Oppose	<p>The use of ratios is problematic for a lay person to determine. Additionally, the vegetation types in the basin are not present as all times of the year and coverage of indigenous or exotic species may change throughout the year. The Mackenzie Basin is home to very rare and threatened plant species. Protection of these species cannot occur if their presence is ignored as they are surrounded by exotic species. The D-G considers that this approach proposed by The Wolds Station is over complicated and does not provide appropriate protection of significant indigenous biodiversity nor does it provide for biodiversity maintenance.</p>
PC18: Definitions	#9 Environmental Defence Society (EDS)	Insert a new definition for "Maintenance" <u>In relation to indigenous biodiversity "Maintenance" means to enable indigenous biodiversity to continue by achieving no-net-loss</u>	Support	<p>The objective, policy and rule framework refer to biodiversity maintenance. Including this definition would provide clarity around what is trying to be achieved.</p>

PC18: Definitions	#13 Meridian	<p>Insert a new definition for “Waitaki Power Scheme Management Area”</p> <p><u>Waitaki Power Scheme Management Area means land within the following areas:</u></p> <ol style="list-style-type: none"> <li>a. <u>The existing footprint of the Waitaki Power Scheme.</u></li> <li>b. <u>On core sites associated with the Waitaki Power Scheme.</u></li> <li>c. <u>On Areas covered by an operating easement associated with the Waitaki Power Scheme.</u></li> </ol>	Support in Part	The D-G supports clarity around what areas the Waitaki Power Scheme specific rules apply. It would also be beneficial for this information to be mapped.
PC18: Rule 12.1.1.a	#16 Mt Gerald Station	<p>Amend Rule 12.1.1.a exemption to include:</p> <p><u>or for the maintenance, repair, replacement or minor upgrade of existing fence lines, roads, stock crossings, firebreaks, drains, ponds, dams, stockyards, farm buildings, airstrips, water troughs, waterlines, waterway crossings or any other utility.</u></p>	Oppose in Part	The D-G agrees that lawfully existing structures and access should be able to be maintained, however the area covered by Rule 12.1.1.a are often sensitive and have the potential to be habitat to terrestrial and aquatic indigenous species. The D-G is concerned that the raft of activities proposed by Mt Gerald Station could result in significant adverse effects on these species.
PC18: Rule 12.1.1.a	#17 The Wolds Station	<p>Amend Rule 12.1.1.a exemption to include:</p> <p><u>or for the maintenance, repair, replacement or minor upgrade of existing fence lines, roads, stock crossings, firebreaks, drains, ponds, dams, stockyards, farm buildings, airstrips, water troughs, waterlines, waterway crossings or any other utility.</u></p>	Oppose in Part	The D-G agrees that lawfully existing structures and access should be able to be maintained, however the area covered by Rule 12.1.1.a are often sensitive and have the potential to be habitat to terrestrial and aquatic indigenous species. The D-G is concerned that the raft of activities proposed by The Wolds Station could result in significant adverse effects on these species.
PC18: Section 19 - Heading	#16 Mt Gerald Station	Delete “indigenous Biodiversity” and replace with “Vegetation Clearance”	Oppose	The proposed heading reflects that the proposed provisions are to cover effects on indigenous biodiversity.
PC18: Section 19 - Heading	#17 The Wolds Station	Delete “indigenous Biodiversity” and replace with “Vegetation Clearance”	Oppose	The proposed heading reflects that the proposed provisions are to cover effects on indigenous biodiversity.
PC18: Objectives - New	#13 Meridian	<p>Insert a new objective to read:</p> <p><u>For Activities associated with the nationally significant Waitaki Power Scheme to</u></p> <ol style="list-style-type: none"> <li>a. <u>Address the special characteristics...</u></li> </ol>	Support in Part	The D-G recognises the national significance of the Waitaki Power Scheme and the need to give effect to the objectives and policies relevant to this infrastructure in the NPS (Renewable Energy Generation) (NPSREG) and the CRPS. Meridian notes that the staged review process causes some discomfort as to how this infrastructure is provided for in the Plan and the D-G agrees that policy recognition is helpful – however it may not be the right place for this to be in the PC18 chapter.

PC18: Objectives – Objective 1	#16 Mt Gerald Station	Delete Objective 1 and replace with: <u>Safeguarding the life-supporting capacity of indigenous biodiversity and ecosystems while also sustaining the reasonable use of land and natural resources.</u>	Oppose	The deletion of the proposed objective 1 and the insertion of Mt Gerald Stations proposed objective will not achieve sustainable management, nor would it set up an appropriate framework for managing indigenous biodiversity or significant indigenous biodiversity.
PC18: Objectives – Objective 1	#17 The Wolds Station	Delete Objective 1 and replace with: <u>Safeguarding the life-supporting capacity of indigenous biodiversity and ecosystems while also sustaining the reasonable use of land and natural resources.</u>	Oppose	The deletion of the proposed objective 1 and the insertion of The Wolds Stations proposed objective will not achieve sustainable management, nor would it set up an appropriate framework for managing indigenous biodiversity or significant indigenous biodiversity.
PC18: Objectives – Objective 2	#16 Mt Gerald Station	Delete Objective 2 and replace with: <u>To maintain and enhance indigenous biodiversity and ecosystem functioning by protecting areas of significant indigenous vegetation and significant indigenous habitats of indigenous fauna.</u>	Oppose	The deletion of the notified Objective 2 and the insertion of Mt Gerald Stations proposed objective will not achieve sustainable management. Section 6(c) is clear that the protection of significant indigenous biodiversity is to be provided for. Mt Gerald Stations proposed deletion and insertion fails to do this.
PC18: Objectives – Objective 2	#17 The Wolds Station	Delete Objective 2 and replace with: <u>To maintain and enhance indigenous biodiversity and ecosystem functioning by protecting areas of significant indigenous vegetation and significant indigenous habitats of indigenous fauna.</u>	Oppose	The deletion of the notified Objective 2 and the insertion of The Wolds Stations proposed objective will not achieve sustainable management. Section 6(c) is clear that the protection of significant indigenous biodiversity is to be provided for. The Wolds Stations proposed deletion and insertion fails to do this.
PC18: Objectives – Objective 3	#16 Mt Gerald Station	Delete Objective 3 and replace with: <u>Enable land use activities that achieve integration of development with protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</u>	Oppose	The deletion of the notified Objective 3 and the insertion of Mt Gerald Stations proposed objective will not achieve sustainable management. The amendment seems to attempt to weaken protection and strengthen the enabling of land development.
PC18: Objectives – Objective 3	#17 The Wolds Station	Delete Objective 3 and replace with: <u>Enable land use activities that achieve integration of development with protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</u>	Oppose	The deletion of the notified Objective 2 and the insertion of The Wolds Stations proposed objective will not achieve sustainable management. The amendment seems to attempt to weaken protection and strengthen the enabling of land development.
PC18: Policies – New Policy	#3 Simons Pass Station Limited	<i>That a policy should be introduced recognising the importance of responding to soil erosion... further that the risk of soil erosion should be a factor discussed in the farm biodiversity plan...</i>	Oppose	Soil shifting in the Mackenzie Basin has always been part of the natural process prior to indigenous vegetation removal and human impact. soil erosion now is generally a result of inappropriate activities such as vegetation clearance which can therefore be addressed by managing when and what vegetation clearance occurs.

PC18: Policies – New Policy	#12 Glenrock Station Limited	Insert the following policy: Policy 4A <u>When rural development is being pursued promote/encourage opportunities to enhance or restore indigenous biodiversity in appropriate locations.</u>	Support in Part	The D-G is support of the promotion or encouragement of opportunities to enhance or restore indigenous biodiversity.  However, the term 'in appropriate locations' may cause issues. The inclusion of this policy should not remove the policy framework which provided clear direction for the management of effects on indigenous biodiversity resulting use and development.  The D-G is supportive of the promotion or encouragement of opportunities to enhance or restore indigenous biodiversity.  However, the term 'where appropriate' may cause issues. The inclusion of this policy should not remove the policy framework which provided clear direction for the management of effects on indigenous biodiversity resulting use and development.
PC18: Policies – New Policy	#12 Glenrock Station Limited	Insert the following policy: Policy 5A <u>Consider a range of mechanisms or methods, where appropriate, to promote/encourage the enhancement of indigenous vegetation including avoidance, remediation, mitigation or offsetting and compensation, and secure these methods through appropriate instruments including resource consent conditions (if approved).</u>	Support in Part	PC18 is about indigenous biodiversity and the effects of activities on indigenous biodiversity. The Policy proposed by Glenrock Station Limited is not appropriate for the Indigenous biodiversity Chapter and overlaps with the policies developed through PC13.
PC18: Policies – New Policy	#12 Glenrock Station Limited	Insert the following policy: Policy 7A <u>Recognise the importance of rural land use and development (including pastoral intensification) in enabling people and communities to provide for their social, economic, and cultural wellbeing.</u>	Oppose	The notified PC18 provisions (subject to the D-G's proposed amendments) already provide clear direction on how significant indigenous biodiversity values should be managed.
PC18: Policies – New Policy	#16 Mt Gerald Station	Insert the following Policy: <u>To allow clearance of significant indigenous vegetation or habitats of indigenous fauna where such activities...</u>	Oppose	The notified PC18 provisions (subject to the D-G's proposed amendments) already provide clear direction on how significant indigenous biodiversity values should be managed.
PC18: Policies – New Policy	#17 The Wolds Station	Insert the following Policy: <u>To allow clearance of significant indigenous vegetation or habitats of indigenous fauna where such activities...</u>	Oppose	The notified PC18 provisions (subject to the D-G's proposed amendments) already provide clear direction on how significant indigenous biodiversity values should be managed.
PC18: Policies – Policy 2	#9 Environmental Defence Society (EDS)	Delete Policy 2 and replace with:  Policy 2A <u>Avoid adverse effects on significant indigenous vegetation and habitat, riparian areas, and linkages between these areas.</u>  Policy 2B <u>Avoid, remedy, or mitigate adverse effects on indigenous biological diversity outside of significant areas.</u>	Support	The intent of the changes sought by EDS reflect the management of adverse effects sought through the D-G's submission.

PC18: Policies – Policy 2	#16 Mt Gerald Station	Delete Policy 2 and replace with: <u>Enable land use activities that make efficient use of land and resources while avoiding, remedying, mitigating or offsetting adverse effects on water, soil, ecosystems and the natural character of the Mackenzie District.</u>	Oppose	Policy 2 should be retained noting the D-G's submission and further submission on EDS's submission.  The policy proposed by Mt Gerald Station ignores the original intent of the notified Policy 2 which is to manage effects on natural values and instead seeks to promote development and the avoidance, remedying or mitigation of effects in a way that makes way for development rather than maintaining indigenous biodiversity. The inclusion of offsetting does not reflect best practice which is included in submission #20.
PC18: Policies – Policy 2	#17 The Wolds Station	Delete Policy 2 and replace with: <u>Enable land use activities that make efficient use of land and resources while avoiding, remedying, mitigating or offsetting adverse effects on water, soil, ecosystems and the natural character of the Mackenzie District.</u>	Oppose	Policy 2 should be retained noting the D-G's submission and further submission on EDS's submission.  The policy proposed by The Wolds Station ignores the original intent of the notified Policy 2 which is to manage effects on natural values and instead seeks to promote development and the avoidance, remedying or mitigation of effects in a way that makes way for development rather than maintaining indigenous biodiversity. The inclusion of offsetting does not reflect best practice which is included in submission #20.
PC18: Policies – Policy 4	#9 Environmental Defence Society (EDS)	Amend Policy 4 to include 'agricultural conversion' and reference to the significant values of wetlands.	Support	Agricultural conversion has the potential to also adversely affect wetlands.
PC18: Policies – Policy 5	#16 Mt Gerald Station	Delete Policy 5 and replace with: <u>Recognise that the maintenance of indigenous biodiversity is dependent on landowners support and will be achieved through and number of mechanisms.</u>	Oppose	While the D-G agrees that maintenance can be achieved in the number of ways, there is a statutory responsibility for Council's to maintain indigenous biodiversity, while landowner engagement helps achieve this – it should be dependent on voluntary participation.
PC18: Policies – Policy 5	#17 The Wolds Station	Delete Policy 5 and replace with: <u>Recognise that the maintenance of indigenous biodiversity is dependent on landowners support and will be achieved through and number of mechanisms.</u>	Oppose	There is a statutory responsibility for Council's to maintain indigenous biodiversity, while landowner engagement helps achieve this – it should not be dependent on voluntary participation.
PC18: Policies – Policy 7	#9 Environmental Defence Society (EDS)	Delete policy 7 and replace with: <u>To recognise that the location of renewable energy generation structures and activities can overlap with indigenous biological diversity values.</u>	Support	The redrafting proposed by EDS recognises that there are overlaps between renewable energy generation activities occur and high value environments.

PC18: Policies – Policy 7	#13 Meridian	Significant amendments to Policy 7	Oppose in Part	While the D-G recognises the national significance of the Waitaki Power Scheme, PC18 is about indigenous biodiversity and the effects of activities on indigenous biodiversity. The intent of the Policy recognition proposed by Meridian is appropriate in the wider plan – but not necessarily in the indigenous biodiversity chapter. The D-G notes that this overlap may be difficult to address adequately through a partial plan review.
PC18: Policies – Policy 8	#16 Mt Gerald Station	Delete Policy 8 and replace with: <u>To enable rural land use and development at an on-farm level where development is integrated with a farm biodiversity process that...</u>	Oppose	PC18 is about indigenous biodiversity and the effects of activities on indigenous biodiversity. The Policy proposed by Mt Gerald Station appears to shift the focus of the policy from allowing development within the scope of how this may impact biodiversity, to providing for biodiversity management secondary to land use and development.
PC18: Policies – Policy 8	#17 The Wolds Station	Delete Policy 8 and replace with: <u>To enable rural land use and development at an on-farm level where development is integrated with a farm biodiversity process that...</u>	Oppose	PC18 is about indigenous biodiversity and the effects of activities on indigenous biodiversity. The Policy proposed by The Wolds Station appears to shift the focus of the policy from allowing development within the scope of how this may impact biodiversity, to providing for biodiversity management secondary to land use and development.
PC18: Rules – New Rules	#16 Mt Gerald Station	3.1.3 Rule(s) that provide for clearance of introduced and mixed and vegetation to occur as permitted activities.	Oppose	The D-G has raised concerns regarding the definitions for determining the vegetation types proposed by Mt Gerald Station. It is considered that rules using these definitions would be difficult to implement on the ground and likely lead to unchecked indigenous vegetation clearance including clearance of significant indigenous biodiversity.
PC18: Rules – New Rules	#17 The Wolds Station	3.1.3 Rule(s) that provide for clearance of introduced and mixed and vegetation to occur as permitted activities.	Oppose	The D-G has raised concerns regarding the definitions for determining the vegetation types proposed by The Wolds Station. It is considered that rules using these definitions would be difficult to implement on the ground and likely lead to unchecked indigenous vegetation clearance including clearance of significant indigenous biodiversity.
PC18: Rules – New Rules	#21 Ferintosh Station	Provide for the opening of Bogs.	Oppose	This activity has the potential to cause significant adverse effects on indigenous biodiversity and depending on the environment is more likely to be considered a land drainage activity which is managed through the regional plan.
PC18: Rules – All Rules	#7 Fish and Game NZ	That springs also be provided protection from vegetation clearance.	Support	The D-G supports this inclusion.

PC18: Rules – Rule 1.1.1.1	#2 Maryburn Station	<i>Consents granted through the Environment Court and Regional Council should be adhered to, with vegetation clearance being a permitted activity when conveying water for irrigation purposes.</i>	Oppose	Regional Consents do not appropriately consider the effects on biodiversity as the regional plan lacks direction and policy framework for making decisions. The role of the management indigenous biodiversity sits with the district council and needs to be dealt with in the District Plan.
PC18: Rules – Rule 1.1.1.1	#3 Simons Pass Station Limited	<i>That the rules should however also be modified to recognise the special issues associated with land at risk of significant soil erosion.</i>	Oppose	Soil shifting in the Mackenzie Basin has always been part of the natural process prior to indigenous vegetation removal and human impact. soil erosion now is generally a result of inappropriate activities such as vegetation clearance which can therefore be addresses by managing when and what vegetation clearance occurs.
PC18: Rules – Rule 1.1.1.1	#3 Simons Pass Station Limited	<i>A rule to be included in Chapter 19 to allow for indigenous vegetation clearance in farm base areas as a permitted activity.</i>	Oppose	Vegetation within Farm Base Areas may still contain vegetation which meets the CRPS criteria.
PC18: Rules – Rule 1.2.1	#16 Mt Gerald Station	<i>3.1.4 Rule(s) that provide for clearance of indigenous vegetation to occur as a controlled activity if a farm management plan (including a component focussed on biodiversity values specific to the property) is prepared...</i>	Oppose	The D-G does not support the activity status to be controlled as this will unlikely provided for biodiversity maintenance or the protection of significant values.
PC18: Rules – Rule 1.2.1	#17 The Wolds Station	<i>3.1.4 Rule(s) that provide for clearance of indigenous vegetation to occur as a controlled activity if a farm management plan (including a component focussed on biodiversity values specific to the property) is prepared...</i>	Oppose	The D-G does not support the activity status to be controlled as this will unlikely provided for biodiversity maintenance or the protection of significant values.
PC18: Rules – Rule 1.2.1 (MOD)	#9 Environmental Defence Society (EDS)	<i>Amend MOD to better identify biodiversity values (Significant and otherwise), identification of threats on values, maintenance of biodiversity, protection of ONLs.</i>	Support	The MOD sought to be included by EDS will better effect to objectives and policies of the Plan as well as the CRPS and Part 2 of the RMA – particularly matters of national importance in s6.
PC18: Rules – Rules 1.2.1 and 1.2.2	#3 Simons Pass Station Limited	<i>The risk of soil erosion should be a factor discussed in the farm biodiversity plan, and taken into account as one of the matters of discretion in rule 19.1.2.1 and 19.1.2.2</i>	Oppose	Soil shifting in the Mackenzie Basin has always been part of the natural process prior to indigenous vegetation removal and human impact. soil erosion now is generally a result of inappropriate activities such as vegetation clearance which can therefore be addresses by managing when and what vegetation clearance occurs.
PC18: Rules – Rule 1.2.2	#8 Canterbury Regional Council (Environment Canterbury)	<i>Amend Rule 1.2.2 to: ...any indigenous vegetation clearance up to 5000m<sup>2</sup> within any site per 100ha in any 5-year continuous period...</i>	Oppose	The use of ratios leads to uncontrolled indigenous vegetation clearance. The land parcels in the Mackenzie Basin are large, often being thousands of ha each. The use of a ratio is only suitable in urban areas with smaller land parcels.

PC18: Rules – Rule 1.2.2	#16 Mt Gerald Station	<p>3.1.4 where no farm management plan is prepared rule(s) to provide for clearance of indigenous vegetation to occur as a restricted discretionary activity...</p> <p>Include a ratio of 5,000m<sup>2</sup> per 100ha.</p>	Oppose	<p>The D-G does not support the activity status to be Restricted discretionary as this will unlikely provided for biodiversity maintenance or the protection of significant values, nor is it consistent with the objective and policy framework in the CRPS or PC18.</p> <p>The use of ratios leads to uncontrolled indigenous vegetation clearance. The land parcels in the Mackenzie Basin are large, often being thousands of ha each. The use of a ratio is only suitable in urban areas with smaller land parcels.</p>
PC18: Rules – Rule 1.2.2	#17 The Wolds Station	<p>3.1.4 where no farm management plan is prepared rule(s) to provide for clearance of indigenous vegetation to occur as a restricted discretionary activity...</p> <p>Include a ratio of 5,000m<sup>2</sup> per 100ha.</p>	Oppose	<p>The D-G does not support the activity status to be Restricted discretionary as this will unlikely provided for biodiversity maintenance or the protection of significant values, nor is it consistent with the objective and policy framework in the CRPS or PC18.</p> <p>The use of ratios leads to uncontrolled indigenous vegetation clearance. The land parcels in the Mackenzie Basin are large, often being thousands of ha each. The use of a ratio is only suitable in urban areas with smaller land parcels.</p> <p>The D-G agrees with the concerns raised by EDS regarding the notified provisions for the Waitaki Power Scheme.</p>
PC18: Section 2 – Waitaki Power Scheme	#9 Environmental Defence Society (EDS)	<p>Bespoke provision for clearance for the Waitaki Power Scheme is accepted in principle, however...</p>	Support	<p>The D-G agrees with the concerns raised by EDS regarding the notified provisions for the Waitaki Power Scheme.</p>
PC18: Appendix Y	#9 Environmental Defence Society (EDS)	<p>Concerns raised around the identification of significant biodiversity and its management in accordance with the objectives and policies contained in PC18 and the operative plan as well as the CRPS and s6 matters in the RMA.</p>	Support	<p>The D-G agrees with the concerns raised by EDS regarding the notified Appendix Y.</p>
General submission on PC19 - Recreational Use Activities	#79 Forest and Bird	<p>Forest and Bird seeks that council include rules to restrict such activities during bird breeding periods.</p>	Support in part	<p>D-G supports restricting motorised and non-motorised crafts on waterbodies to protect bird habitat and breeding sites.</p>
General submission on PC19	#153 Meridian Energy Limited	<p>Amend the provisions within Plan Change 19 to ensure that the rules enable the operation and maintenance of the Waitaki Power Scheme is protected and provide for activities related to the operation, maintenance, upgrading and development of the Waitaki Power Scheme.</p>	Oppose in part	<p>D-G does not oppose the intent of Meridian Energy's amendments to Plan Change 19 specifically in regard to operating the Waitaki Power Scheme. However, D-G wants to ensure the operational activities undertaken are managed appropriately.</p>



General submission on PC19	#155 Genesis Energy Limited	Amend the provisions within Plan Change 19 to ensure that the rules enable the operation and maintenance of the Waitaki Power Scheme is protected and provide for activities related to the operation, maintenance, upgrading and development of the Waitaki Power Scheme.	Oppose in part	As above, D-G does not oppose the intent of Genesis Energy's amendments to Plan Change 19 specifically in regard to operating the Waitaki Power Scheme. However, D-G wants to ensure the operational activities undertaken are managed appropriately.
PC19: Definitions	#162 Opuha Water Limited	Amend the District Plan's definition of "commercial activity" as follows: <i>Commercial Activity: means the use of land, and water and buildings for the display, offering, provision, sale or hire of goods, equipment, or services, and includes shops, showrooms, travel and real estate agencies, restaurants, takeaway food bars, professional, commercial and administrative offices, service stations, motor vehicle sales, the sale of liquor and associated parking areas; and recreational activities but excludes recreational, community and service activities, home occupations and visitor accommodation. Notwithstanding that service activities are excluded, commercial activity includes the ancillary manufacturing or repair of goods which have the same or similar effect on the environment as the retailing of those goods.</i>	Oppose	The D-G disagrees with Opuha Water Limited's interpretation of the changes proposed to the definition of 'commercial activity'. The proposed amendment is confusing as the definition already excludes recreational activities.
PC19: Policies – Rural Policy 8A – Values of Waterbodies	#94 Alister and Haidee McCabe	Additional Policy sought to acknowledge the importance of recreational activities to individuals and the ability for these to continue to have this opportunity.	Support in Part	D-G recognises the values associated with recreational activities and the wider benefits to the community. However, management of motorised craft in waterbodies is required to protect amenity values, habitats and takata whenua values.
PC19: Policies – Rural Policy 8B – Lake Pukaki	#144 Central South Island Fish and Game	Reword to: Rural Policy 8B – Lake Pukaki <i>To protect the unique natural quiet, beauty and tranquility values and experience of Lake Pukaki by avoiding commercial motorised activities on the Lake other than for essential activities.</i>	Oppose	D-G opposes limiting the policy to avoid only commercial motorised activities. D-G considers that managing all motorised activities will ensure the unique values associated with Lake Pukaki are protected and also removes the risk of aquatic pest species being transferred to the Lake.
PC19: Policies – Rural Policy 8C – Commercial Activities	#148 Canterbury Regional Council (Environment Canterbury)	Amend Rural Policy 8C to: <i>To avoid, remedy or mitigate the adverse effects of commercial activities through assessment by way of resource consent, except for commercial activities on or within the waterbody of Lake Pukaki.</i>	Support	D-G supports the amendment as it is consequential to the prohibited activity status of commercial activities on Lake Pukaki.

<p>PC19: Policies – Rural Policy 8E - Effects on Wildlife and Wildlife Habitat</p>	<p>#162 Opuha Water Limited</p>	<p>Amend Rural Policy 8E as follows:  <i>To avoid, remedy or mitigate the adverse effects of the recreational or commercial use of riverbeds and waterbodies (in particular the use of off-road vehicles and power boats) on wildlife and wildlife habitats.</i></p>	<p>Support</p>	<p>D-G supports the inclusion of commercial use activities.</p>
<p>PC19: Policies – Rural Policy 8E – Effects on Wildlife and Wildlife Habitat Explanation and Reasons</p>	<p>#144 Central South Island Fish and Game</p>	<p>Reword bullet point 5 to:  <i>The predominately single thread braided river channels of the Opihi and Opuha rivers and the single, narrow confines of the South Opuha and North Opuha are widely utilised by trout and salmon spawning, incubation and juvenile rearing. The Opihi and Opuha rivers contain brown trout and salmon (spawning 1 Apr-30 Sept) and N Opuha and S Opuha contain brown and rainbow trout (spawning 1 May-30 Nov). During the spawning season (April to September) eggs and fry buried in the riverbed gravels are particularly susceptible to disturbance from motorised boats.</i></p>	<p>Oppose in part</p>	<p>D-G opposes removing 'during the spawning season... from motorised craft'. D-G is concerned with the noise effects of motorised craft on birds.</p>
<p>PC19: Policies – Rural Policy 8G</p>	<p>#148 Canterbury Regional Council (Environment Canterbury)</p>	<p>Amend Rural Policy 8G as follows:  <del>To seek the continued administration and control of navigational safety matters principally through</del>  <i>support the Canterbury Regional Council in implementing navigation safety regulations or bylaws equivalent mechanisms under the Harbours Act and its successor.</i>  <i>Explanation and reasons...</i></p>	<p>Support</p>	<p>The Canterbury Regional Council manages navigation safety through a bylaw under the Local Government Act 1974.</p>

PC19: Rules	#79 Forest and Bird	<p>Forest and Bird seeks that conditions/standards to:</p> <ul style="list-style-type: none"> <li>Restrict activities during fish spawning and bird breeding periods,</li> <li>Set out that a pest is a species identified in the regional pest management plan</li> <li>avoid adverse effects on water quality and non target species when undertaking pest control activities</li> <li>measures to avoid or mitigate effects on amenity values including noise</li> </ul> <p>measures to avoid or mitigate effects on ecological values including noise (i.e. during bird breeding periods)</p>	Support in part	D-G supports the outcomes sought.
PC19: Rules – Rules 7A.1.1.a, 7A.2.1.a, 7A.3.1.a and 7A.4.1.a	#148 Canterbury Regional Council (Environment Canterbury)	<p>Amend Rule 7A.4.1a as follows:</p> <p>7A.4.1 Permitted Activities on or within the Opihi and Opuha Rivers</p> <p>7A.4.1.a Use of motorised and non-motorised craft for search and rescue, civil emergency, scientific research and monitoring and pest control purposes, <u>where the activity is an enactment of a statutory responsibility.</u></p>	Support in part	D-G recognises that some activities require the use of motorised and non-motorised craft on waterbodies as part of statutory functions and requiring consents for the use of these craft may be onerous.
PC19: Rules – Rule 7A.2.2	#125 Pukaki Tourism Holdings Ltd	<p>Amend 7A.2.2 Non-complying Activities on or within Lake Pukaki (a) Commercial non-motorised activities from Non-complying Activity to Discretionary Activity.</p>	Oppose	D-G opposes amending the activity status of commercial activities on Lake Pukaki.
PC19: Rules – Rule 7A.4 - Activities on Opihi and Opuha Rivers	#131 Timaru District Council	<p>Plan Change 19 provides for such activities to be non-complying activities, while the Timaru District Plan provides for such activities being prohibited with very limited exceptions. Timaru District Council seek that Mackenzie District Council consider the cross boundary matters as described in the submission.</p>	Support	D-G supports consistency across District Plans. D-G also supports prohibiting activities on the rules (with exemptions) to protect habitats and support bank stability.
PC19: Rules – Rule 7A.4.1.a	#162 Opuha Water Limited	<p>Amend Rule 7A.4.1a as follows:</p> <p>7A.4.1 Permitted Activities on or within the Opihi and Opuha Rivers</p> <p>7A.4.1.a Use of motorised and non-motorised craft for search and rescue, civil emergency, scientific research and monitoring, <u>consent monitoring, operational inspections of Opuha Scheme infrastructure and pest control purposes.</u></p>	Oppose	As stated above, D-G recognises that some activities require the use of motorised and non-motorised craft on waterbodies and consider that these are appropriately provided for by the notified rule.

<p>PC19: Rules – Rule 7A.4.3</p>	<p>#162 Opuha Water Limited</p>	<p>Include new rule 7A.4.4 as follows: <u>7A.4.4. Prohibited Activities on or within the Opihi and Opuha Rivers</u> <u>7A.4.3.a Commercial motorised activities during the period 1 April to 30 September.</u> <u>7A.4.3.b Non-commercial motorised activities during the period 1 April to 30 September.</u></p>	<p>Oppose in Part</p>	<p>D-G supports prohibiting motorised crafts on the Opihi and Opuha River – particularly due to the sensitive ecological values present.</p>
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