

# Submission on the Proposed Plan Change 30 to the Mackenzie District Plan



Clause 6 of the First Schedule, Resource Management Act 1991

Form 5

17 January 2025

To: Mackenzie District Council  
Mackenzie District Council  
PO Box 52, Main Street  
Fairlie 7949  
By email: [districtplan@mackenzie.govt.nz](mailto:districtplan@mackenzie.govt.nz)

## 1. Submitter details

Royal Forest & Bird Protection Society of New Zealand Incorporated (Forest & Bird)  
PO Box 631  
Wellington 6140

Contact Name: Nicky Snoyink (Regional Conservation Manager Canterbury and West Coast)  
Contact Email: [n.snoyink@forestandbird.org.nz](mailto:n.snoyink@forestandbird.org.nz) (preferred method of contact)  
Contact Phone: 021 165 9658

## 2. Trade competition declaration

Forest & Bird could not gain an advantage in trade competition through this submission.

## 3. Hearing options

Forest & Bird wish to be heard in support of this submission.

Forest & Bird would consider presenting a joint case with others making a similar submission.

#### **4. Submission**

The Royal Forest & Bird Protection Society of New Zealand Incorporated (Forest & Bird) is New Zealand's largest and oldest non-government conservation organisation. For almost one hundred years, Forest & Bird has been giving a voice to nature on land, in freshwater and at sea, on behalf of its many members and supporters. Volunteers in fifty Forest & Bird branches throughout Aotearoa New Zealand carry out conservation and biosecurity projects in their communities including weed control, restoration and pest trapping.

Forest & Bird's constitutional purpose is:

*To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.*

In support of that purpose, Forest & Bird regularly participates in resource management processes at the national, regional, and district level. This is a submission by Forest & Bird on Proposed Plan Change 30 to the Mackenzie District's District Plan.

The submission relates to Proposed Plan Change 30 – Special Purpose Zones and deals with the Glentanner Station Special Purpose Zone ('GSPZ') and following topics:

- Introduction text to the GSPZ
- GSPZ objectives and policies
- GSPZ rules
- GSPZ standards
- GSPZ Structure Plan

It begins with an overall submission point on the GSPZ followed by specific submissions on each provision of interest to Forest & Bird.

#### **Overall submission point**

Lake Pūkaki, Twin Stream and the Tasman River, along with indigenous biodiversity and natural character are all what makes Glentanner Station unique. Appendix I of the operative District Plan states:

- Lake Pūkaki provides feeding and breeding grounds for blackstilt and other waterfowl and waders, and a habitat for three endemic moth species.
- The Tasman River and associated lagoons and Carex sp swamps provide very valuable habitat for waders and waterfowl including breeding area for wrybill, blackstilt, black fronted tern and banded dotterel. The threatened plants Carmichaelia kirkii (vulnerable),

*Luzula celata, Coprosma intertexta (vulnerable), and Triglochin palustre are found in this area.*

The section 32 report states at 3.4 that:

*The location of the SPZs within the wider Te Manahuna / Mackenzie Basin means that the natural environmental values present are of importance and need to be recognised and provided for.*

And at 5.1 the section 32 describes the Investment Logic Map for the District Plan review identified one of the four key problems the plan review should address as 'failure to protect our natural landscapes, water & indigenous biodiversity, erodes Mackenzie's unique environment'

At 5.14 the section 32 explains because of the location of Glentanner and the site's largely undeveloped nature it is highly likely that indigenous vegetation is present.

The section 32 also reports that the Department of Conservation ('DOC') releases black stilts at a site less than 4km from the southern end of Glentanner Aerodrome, and that un-manned rockets were potentially impacting on the breeding of Black Stilts due to noise.

It is not clear to us whether any ecological assessment was commissioned to support review of the Glentanner Station resource management framework. What is clear is that indigenous biodiversity and natural character values likely exist at the site. As drafted, the GSPZ is too heavily focussed on enabling primary production, commercial tourism, recreation, residential, accommodation and airport activity and development. Enabling these activities without careful management does not protect or maintain the natural character values and indigenous biodiversity values which make the site unique.

Forest & Bird submit the GSPZ must carefully consider these matters and that objectives, policies, rules and standards to protect the indigenous biodiversity and natural character of the area are included in accordance with Part 2 of the Resource Management Act ('the Act') particularly sections 6(a), 6(b), 6(c), 7(d) and 7(e).

Detailed relief sought is set out in the table below. In addition, Forest & Bird seeks any consequential changes or alternative relief to achieve the relief sought.

Provision	Support/Oppose/Amend	Relief Sought	Reasons
The specific provisions of the proposal that my submission relates to e.g. provision number, map number		<p>What decision are you seeking from Council? What action would you like: retain/amend/add/delete?</p> <p><b>Text that is shown as <u>underlined</u> is proposed to be added. Text shown with <del>strikethrough</del> formatting is proposed to be deleted.</b></p>	
Part 3 – Area-Specific Matters			
Glentanner Special Purpose Zone (GSPZ)			
General comment	Amend	<p>Retain the scope of the chapter and zone being to manage the effects of Glentanner Station land use, development and activities, but expand introduction text to protect and maintain indigenous biodiversity in the area and protect natural character values.</p>	<p>Glentanner Station is likely to contain indigenous vegetation and habitat for indigenous fauna too or at the very least have effects on the Twin Stream, Lake Pūkaki and Tasman River, which provide habitat for indigenous species and contain indigenous biodiversity and natural character values.</p> <p>Increased development, and in particular increased frequency, aircraft type and noise from aircraft need to be carefully managed to ensure the zone meets sections 6 and 7 of the Act and National Policy</p>

			Statement for Indigenous Biodiversity obligations.
GSPZ Introduction			
Introduction text	Amend	<p>Amend introduction text as follows:</p> <p><i>The Glentanner Special Purpose Zone (GSPZ) is located west of Lake Pūkaki to the north and south of Twin Stream. The Zone is located within the wider Te Manahuna/the Mackenzie Basin which is recognised for its outstanding natural landscape values and predominance of significant indigenous vegetation and fauna.</i></p> <p><i>The purpose of the GSPZ is to provide for commercial tourism development, residential and visitor accommodation, <u>and</u> airport activity, <u>and</u> a range of rural and recreation activities where in a carefully managed way that has minimal environmental impacts on the natural character and indigenous biodiversity values associated with area are minimal.</i></p>	<p>As drafted the introduction text is too heavily focussed on the activities that the zone provides for but not the natural environment values of the zone that need to be protected. Amendments sought to the text aim to strike the right balance.</p> <p>Some of the GSPZ rules make a distinction between the Tourist Development Area and Ecological Open Space north and south of the Twin Stream. Forest &amp; Bird submit that, to ensure different rules are properly applied, a change is required to the structure plan so that the areas are:</p> <ul style="list-style-type: none"> <li>• 'Ecological Open Space North'</li> <li>• 'Ecological Open Space South'</li> <li>• 'Tourist Development Area North'</li> </ul>

		<p><i>The zone also provides for a range of rural and recreation activities.</i></p> <p><i>Activities in the GSPZ therefore need to be comprehensively assessed to ensure built form is located in appropriate locations, while having regard to that recognise the zone's natural hazards, and protect natural character, landscape values, indigenous biodiversity, ecological enhancement and servicing constraints characteristics.</i></p> <p><i>The GSPZ is divided into three five Land Development Areas that are referenced throughout the Chapter and displayed in the accompanying Structure Plan (Figure GSPZ-1: Glentanner Special Purpose Zone Structure Plan (GSP-SP)). Development constraints to avoid hazards from landslip erosion and flooding have been applied to the area south of Twin Stream.</i></p>	<ul style="list-style-type: none"> <li>• 'Tourist Development Area South'</li> </ul> <p>Amendments sought to the last paragraph of the introduction text reflects that change sought.</p> <p>In the first paragraph, there is a spelling mistake in Twin Stream and needs to be added to stream.</p>
GSPZ Objectives and Policies			
GSPZ-O1 Zone Purpose	Amend	Amend the objective as follows:	As drafted the objective only seeks ecological enhancement activities. The purpose of the zone should

		<p><i>The GSPZ contains primary production, commercial tourism, <u>recreation</u>, residential and visitor accommodation, <u>conservation</u>, and airport development activities together with rural, recreation and ecological enhancement activities natural character and indigenous biodiversity values, which are managed in an integrated way.</i></p>	<p>include outcomes around preserving natural character, protecting and maintaining indigenous biodiversity and natural character too.</p> <p>Amendments sought seek to shift the focus away from development to activities and acknowledge that these activities are in an environment with natural character and indigenous biodiversity.</p>
GSPZ-O2 Zone Character and Amenity Values	Amend	<p>Amend GSPZ-O2 as follows:</p> <p><u><i>Zone Character and Amenity Values</i></u></p> <p><i>The GSPZ is a desirable tourism, residential and airport/aviation destination, which:</i></p> <ol style="list-style-type: none"> <li><i>1. <del>Contains a range of primary production, commercial tourism, residential, recreational and airport related buildings and structures consistent with;</del></i></li> <li><i>2. Maintainsing a predominance of open space over built form;</i></li> <li><i>3. Recognising, Pprotectsing and enhancesing indigenous biodiversity values;</i></li> </ol>	<p>The objective title does not represent the suite of values are relevant to the zone. Deletion of amenity is sought given natural character and biodiversity values are relevant.</p> <p>The objective text needs to be amended to ensure Council meets its obligations under the Act to preserve natural character, protect significant indigenous biodiversity, maintain, enahnce and restore indigneous biodiversity.</p> <p>GSPZ-02.5 should be protect to align with section 6(b) of the Act .</p>

		<p><i>4. Recognising and appropriately managing the risks from natural hazards; and</i></p> <p><i>5. Protecting Retains the outstanding natural landscape values of the wider Te Manahuna/Mackenzie Basin ONL that surrounds the GSPZ.</i></p> <p><i>6. Preserving the natural character values of Twin Stream, Lake Pūkaki and the Tasman River.</i></p>	Structural changes are sought to ensure the plan appropriately expresses outcomes sought for those activities that are allowed.
GSPZ-P1 Development in the GSPZ	Amend	<p>Amend GSPZ-P1 as follows:</p> <p><i>Manage development within the GSPZ to ensure:</i></p> <p><i>1. Built form is:</i></p> <p><i>i. appropriately located and in general accordance with according to the Structure Plan in Figure GSPZ-1; and</i></p> <p><i>ii. of a scale, design and colour compatible with the character, amenity values and purpose of the GSPZ and the outstanding natural landscape values of the wider Te Manahuna/the Mackenzie Basin ONL.</i></p>	<p>GSPZ-P1.1.i. should use 'in general accordance with'.</p> <p>GSPZ-P1.1.ii. should ensure scale and design are compatible with the natural character and indigenous biodiversity values. The amendment sought tries to remove unnecessary wording so the policy uses the wording in GSPZ-O1 and GSPZ-O2 titles being character, values and purpose.</p> <p>For GSPZ-P1.3, infrastructure being developed should be compatible</p>

	<p>2. <i>A predominance of open space over built form is maintained across the GSPZ;</i></p> <p>3. <i>Development can be appropriately serviced through provision of infrastructure <u>which is compatible with the character, values and purpose of the GSPZ</u> avoids, remedies or mitigates adverse effects on water quality and landscape values;</i></p> <p>4. <i>The location and design of roads, access tracks and associated structures are compatible with the character, amenity values and purpose of the GSPZ and the outstanding natural landscape values of the wider Te Manahuna/the Mackenzie Basin OLE;</i></p> <p>5. <i>The effects of earthworks are appropriately managed;</i></p> <p>6. <i>Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected and enhanced; and</i></p>	<p>with the character, values and purpose of the GSPZ.</p> <p>GSPZ-P1.7 should be rearranged for readability.</p>
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		<p><i>7. Recognises and manages The presence of natural hazards is recognised and appropriately managed.</i></p>	
GSPZ-P2 Tourist Development Area	Amend	<p>Amend GSPZ-P2 as follows:</p> <p><i>In the Tourist Development Areas, as shown on the Structure Plan in Figure GSPZ-1:</i></p> <p><i>1. Enable primary production, commercial tourism, recreation and residential activity to be undertaken whilst recognising and protecting indigenous biodiversity and natural character values within the areas identified as Tourism Development on the Structure Plan in Figure GSPZ-1.</i></p> <p><i>2. Recognise that the area south of Twin Stream is subject to natural hazard risks and ensure that any future built development of that area is subject to further specialist technical assessment to ensure risks are appropriately managed.</i></p>	<p>To be clearer, the policy may benefit from a sentence up front about where the policy applies to.</p> <p>This policy should include direction around recognising and protecting the biodiversity values in Tourist Development Areas. This is particularly important as indigenous species do not adhere to structure plan and zone boundaries and noise, built development, earthworks and other activities are likely to have an effect on indigenous vegetation, fauna and natural character, which needs to be managed.</p>

GSPZ-P3 Ecological Open Space	Amend	<p>Amend GSPZ-P3 as follows:</p> <p><u><i>In the Ecological Open Space Areas, as shown on the Structure Plan in Figure GSPZ-1:</i></u></p> <ol style="list-style-type: none"> <li><i>1. Avoid built form, <del>and</del> commercial development <del>and use and airport activities within the areas identified as Ecological Open Space on the Structure Plan in Figure GSPZ-1;</del></i></li> <li><i>2. Provide for the continuation of lawfully established primary production existing level of pastoral intensification and agricultural conversion activities in the area south of Twin Stream;</i></li> <li><i>3. Recognise the benefits of continued lawfully established grazing of the area north of Twin Stream to control wilding conifers and other weeds; and</i></li> <li><i>4. Encourage conservation activity and ecological enhancement of the areas identified as Ecological Open Space.</i></li> </ol>	<p>As stated above, the policy would benefit from where it applies to being stated upfront.</p> <p>All activities should be avoided in the Ecological Open Space areas as these are most likely to produce adverse effects on biodiversity and natural character values.</p> <p>Forest &amp; Bird hold concerns around the measurability and enforcement of the second clause of the policy. The existing level of pastoral intensification and agricultural activities is hard to measure. Further, pastoral intensification and agricultural conversion activities in the area south of Twin Stream may have effects on Lake Pūkaki and indigenous biodiversity values. Further intensification and conversion should not be provided for without assessment of it against these values.</p> <p>The policy should be clear that continued primary production and agricultural conversion activities</p>
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			should be that which is lawfully established.
GSPZ-P4 Airport Area	Amend	<p>Amend GSPZ-P4 as follows:</p> <p><u><i>In the Airport Area, as shown on the Structure Plan in Figure GSPZ-1:</i></u></p> <ol style="list-style-type: none"> <li><i>1. Provide for airport activity and airport support activity to operate in a safe and efficient manner, <u>where it is compatible with the character, values and purpose of the GSPZ</u> while maintaining the function, character and amenity of the GSPZ.</i></li> <li><i>2. Recognise that land adjacent to State Highway 8 used as a taxiway is visually vulnerable and avoid built form within the areas identified on the Structure Plan in Figure GSPZ-1 as 'No Build'.</i></li> <li><i>3. Recognise that airport activity may cause adverse effects on indigenous biodiversity and natural character values and airport activity should be appropriately managed to ensure indigenous biodiversity and natural character values are protected.</i></li> </ol>	<p>As stated above, the policy would benefit from where it applies to being stated upfront.</p> <p>The policy must also include wording around carefully managing airport activity. This is required to meet Council's obligations under section 6 around preserving natural character, protecting outstanding natural landscapes and protecting and maintaining indigenous biodiversity. Increased frequency of loud aircraft will inevitably disturb indigenous species.</p>

New GSPZ policies		Introduce two new policies; one for commercial forestry and woodlots, the other for planting of wilding conifers.	The GSPZ includes rules for commercial forestry and woodlots and the planting of wilding conifers (GSPZ-R18 and GSPZ-R19), which Forest & Bird support, however policies providing direction to plan users is missing. This direction will be particularly important if either activities are proposed in the future. The policy should signal that both activities should be avoided.
<b>GSPZ Rules</b>			
GSPZ Rules – General Comment	Amend	Amend rules to refer to standards that apply.	Across all GSPZ rules the rule must state 'where the activity complies with the following standards' and identify the relevant standards. As drafted, some activities are not subject to setbacks from waterbodies and should be – in particular airport activity and primary production. This could be through a cross reference to the NATC setback rule.
GSPZ-R1 Building and Structures (Excluding Airport Buildings)	Support	Retain as notified	Forest & Bird support the non-complying activity classification for buildings and structures in the Ecological Open Space Area. It's

			important that ecological values are protected in these areas.
GSPZ-R2 Airport Buildings	Oppose	<p>Change GSPZ-R2 so Airport Buildings are a Restricted Discretionary Activity and include matters of discretion relating to protecting indigenous vegetation, indigenous flora habitat, and preserving natural character.</p> <p>Retain the non-complying activity status for Airport Buildings in the Ecological Open Space Area and Tourist Development Area.</p>	<p>Forest &amp; Bird are concerned that airport buildings will inevitably increase airport activity on the site, which has the potential to adversely effect indigenous biodiversity and natural character. This should be considered through a resource consent process.</p> <p>Forest &amp; Bird support the non-complying activity status for Airport Buildings in the Ecological Open Space Area and Tourist Development Area.</p>
GSPZ-R4 Recreational Activity	Oppose	Amend GSPZ-R4 so new standards are introduced to manage effects on indigenous biodiversity and natural character.	Forest & Bird are concerned that some recreational activities would produce an adverse effect on indigenous biodiversity. Given the recreational activity definition is so broad, Forest & Bird seek that the rule appropriately manages this through inclusion of standards and limiting recreational activity to the Tourism Development Area. Council may benefit from advice from an Ecologist on an appropriate level of

			recreational activity in areas throughout the zone.
GSPZ-R5 Rural Tourism Activity	Oppose	Amend GSPZ-R4 so rural tourism activity is enabled in the Tourist Development Area only, and insert new standards managing effects from the activity on indigenous biodiversity and natural character.	Forest & Bird are concerned that some rural tourism activity would produce an adverse effect on indigenous biodiversity. Forest & Bird seek that the rule appropriately manages this through inclusion of standards and limiting it to the Tourism Development Area. Further advice should be sought on an appropriate level of rural tourism activity in areas throughout the zone to protect indigenous vegetation and habitat.
GSPZ-R6 Primary Production	Oppose	Insert new restricted discretionary rule managing intensification and new primary production in the Tourist Development Area and Airport Area with matters of discretion including indigenous biodiversity and natural character.  Insert a non-complying rule for intensification and new primary production in the Ecological Open Space Areas.	Forest & Bird is seeking the zone provisions control new primary production in Ecological Open Space. The amendments; intended to provide for existing primary production uses only, are important to achieve protection of indigenous biodiversity in these areas.  For clarity, Ecological Open Space Areas north and south of the Twin Stream should be shown on the Structure Plan. This is particularly

		<p>Amend the permitted activity text so that only existing and lawfully established primary production is enabled through this rule.</p> <p><i>Activity Status: PER</i></p> <p><i>Where:</i></p> <p>1. <u>Existing primary production</u>  <u>undertaken on the north side of</u>  <u>Twin Stream is lawfully established</u>  <u>and restricted to the grazing of</u>  <u>stock; or</u></p> <p>2. <u>Existing primary production</u>  <u>undertaken on the south side of</u>  <u>Twin Stream is lawfully established.</u></p>	<p>important if different types of activities are provided for in the different areas.</p> <p>Again, Forest &amp; Bird are concerned at the lack of standards around permitted primary production. We submit advice from an Ecologist on an appropriate level of activity in areas throughout the zone is necessary.</p>
GSPZ-R7 Residential Activity	Support	Retain GSPZ-R7 as notified.	Forest & Bird supports the non-complying activity status for residential activity in the Ecological Open Space.
GSPZ-R8 Commercial Activity	Support	Retain GSPZ-R8 as notified.	Forest & Bird support the non-complying activity status for Commercial Activity in the Ecological Open Space Area.

GSPZ-R9 Commercial Visitor Accommodation, Residential Visitor Accommodation, Camping Grounds	Support	<p>Retain GSPZ-R9 as notified.</p> <p>Introduce new standards applying to camping to manage effects on indigenous biodiversity in the Tourist Development Area.</p>	<p>Forest &amp; Bird support the non-complying activity status in the Ecological Open Space and Airport Area.</p> <p>Forest &amp; Bird support density standards for commercial visitor accommodation, residential visitor accommodation and submit the same should apply to camping grounds in the Tourist Development Area to protect indigenous biodiversity values in the area.</p>
GSPZ-R10 Earthworks	Oppose	<p>Remove ability to undertake earthworks subject to an approved building consent.</p> <p>Reduce earthworks quantities and areas to lower limits to appropriately manage effects on indigenous biodiversity and natural character.</p> <p><b><i>Tourist Development Area/Airport Area</i></b></p> <p><b><i>Activity Status: PER</i></b></p>	<p>Forest &amp; Bird hold a number of concerns regarding the earthworks rule.</p> <p>Firstly, we are concerned about the rule enabling earthworks if they are subject to an approved building consent. This circumvents the consideration of effects on indigenous vegetation and habitat of indigenous fauna. We seek deletion of the first part of GSPZ-R10.1.</p> <p>Forest &amp; Bird are concerned about the large volume and area of earthworks permitted. Earthworks</p>

	<p><i>Where:</i></p> <p>1. <i>The earthworks are subject to an approved building consent; or otherwise do not exceed 1500m<sup>3</sup> (by volume) and 2500m<sup>2</sup> (by area) in any 1-year period.</i></p> <p><i>And the activity complies with the following standards:</i></p> <p><i>EW-S1 — Maximum slope Gradient</i></p> <p><i>EW-S2 — Excavation and Filling</i></p> <p><i>EW-S3 — Rehabilitation and Reinstatement</i></p> <p><i>EW-S4 — Accidental Discovery Protocol</i></p> <p><i>EW-S5 — Specific Locations</i></p> <p><i>EW-S6 — Proximity to the National Grid</i></p> <p><b><i>Ecological Open Space</i></b></p> <p><i>Activity Status: PER</i></p> <p><i>Where:</i></p>	<p>across large areas are likely to effect indigenous vegetation and habitat likely to be present in the areas. Council must seek advice to establish whether the permitted volume and area of earthworks is appropriate.</p> <p>Thirdly, as drafted it is not clear whether the volume and area limits apply across the Tourist Development and Airport Areas cumulatively or in each area. This should be explicitly stated.</p> <p>Indigenous fauna and vegetation is likely to be present in the Tourist Development Area and Airport Zone or effected by activities within them. Natural character would most likely be affected by earthworks too. Matters of discretion therefore must include any adverse effects on indigenous flora and fauna and natural character values.</p> <p>Earthworks in all areas should be undertaken outside of breeding season to ensure indigenous species are not injured or disturbed. A</p>
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		<p><i>2. Undertaken for the purpose of the maintenance and repair of existing fence lines, tracks, reticulated stock water systems (including troughs) or infrastructure; and</i></p> <p><i>3. Undertaken on the south side of Twin Stream being ancillary to the continued use of that area for lawfully established primary production.</i></p> <p><i>4. The earthworks do not exceed xxm3 (by volume) and xxm2 (by area) in any 1-year period and cumulatively across the Ecological Open Space Area.</i></p> <p><i>5. The earthworks are undertaken outside of the breeding season of xyz which is month-month.</i></p>	<p>standard should be added to that effect. Advice should be sought from an ecologist on this but as a start, we know Black Stilt are present in the surrounding environment.</p> <p>For earthworks within the Ecological Open Space Area, an area limit should apply and earthworks should be subject to the same EW chapter standards particularly EW-S1, EW-S2, EW-S3, EW-S4 and EW-S5.</p> <p>Earthworks on the southern side of Twin Stream should be for the continued use of that area for lawfully establishing primary production only.</p> <p>Forest &amp; Bird support non-complying activity status where earthworks do not meet permitted activity performance standards in the Ecological Open Space.</p>
GSPZ-R12 Airport Activity	Oppose	Retain GSPZ-R12 classifying Airport Activity as a non-complying activity in the Ecological Open Space Area.	Forest & Bird support airport activity being a non-complying activity in the Ecological Open Space Area.

		<p>Remove Airport Activity as a permitted activity.</p> <p>Amend rule to make Airport Activity a Restricted Discretionary Activity so effects from Airport Activity on indigenous biodiversity and natural character are appropriately managed. Include indigenous vegetation, indigenous flora and natural character as matters of discretion.</p>	<p>Airport Activity involves noise and by extension effects on indigenous vegetation and habitat of indigenous fauna. Stricter performance standards around the number, type, timing and noise emissions of aircraft in the Airport Area must be applied to ensure effects are appropriately managed.</p> <p>Our members have reported the rocket powered aircraft taking off from Glentanner Aerodrome is extremely noisy and would no doubt affect indigenous biodiversity. DOC raised the same issue with Council. Enabling airport activity as a permitted activity without any standards is not appropriate.</p> <p>It is not acceptable to say that because these activities accord with the operative District Plan and are consistent with the activity anticipated at the airport, there are no grounds to impose any restrictions on the current use of the Glentanner Aerodrome. Council has obligations to protect and</p>
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			<p>maintain indigenous biodiversity. Further, the section 32 acknowledges an issue the District Plan is trying to resolve is 'failure to protect our natural landscapes, water &amp; indigenous biodiversity, erodes Mackenzie's unique environment'. It is our view Airport Activity must be more carefully managed than as drafted.</p> <p>Indigenous vegetation and fauna do not strictly adhere to zone and structure plan boundaries so any aircraft number restrictions in the Tourist Development and Airport Areas should be cumulative.</p>
GSPZ-R13 Airport Support Activity	Oppose	<p>Retain classification of airport support activity as a non-complying activity in the Tourist Development and Ecological Open Space Areas.</p> <p>Introduce standards in GSPZ-R13 which manage effects on indigenous biodiversity and natural character.</p>	<p>Forest &amp; Bird support airport support activity being a non-complying activity in the Tourist Development and Ecological Open Space Areas.</p> <p>Within the Airport Area, airport support activity must be subject to permitted performance standards. The definition of airport support activity is far reaching and could result in adverse effects on</p>

			indigenous biodiversity and natural character including through inappropriately positioning aircraft refuelling and engineering activities.
GSPZ-R15 Activities Not Otherwise Listed	Amend	Amend GSPZ-R15 activity status to non-complying.	Forest & Bird are seeking for all other activities not listed a non-complying activity status applies. Presumably all acceptable activities, where effects can be managed have been provided for. The plan should send that signal and subject any other activities to the s104D gateway test given they are unlikely to be appropriate.
GSPZ-R16 Buildings and Structures Not Otherwise Listed	Amend	Amend GSPZ-R16 activity status to non-complying.	For the reasons set out in our submission point above, we seek all other buildings and structures not already provided for to be classified as a non-complying activity as well.
GSPZ-R17 Industrial Activities	Oppose	Delete GSPZ-R17	Forest & Bird support the activity status for industrial activities in the Tourist Development Area and Ecological Open Space. However, we question the need for the rules to provide for industrial activity as the airport support activity

			<p>definition provides for any ancillary industrial activity.</p> <p>Providing for industrial activity that is ancillary to airport support activity may lead to industrial activity developing on the site that is barely related to activities occurring on site.</p>
GSPZ-R18 Commercial Forestry and Woodlots	Support	Retain GSPZ-R18 as notified	Forest & Bird support commercial forestry and woodlots being a non-complying activities. To assist consents planners processing such a consent a policy around commercial forestry and woodlots would be helpful. This is sought earlier in our submission.
GSPZ-R19 Planting of Wilding Conifers	Support	Amend GSPZ-R19 to be clear what species of conifers the rule controls planting of.	Forest & Bird support planting of wilding conifers being a non-complying activity. As we know, conifers affect our indigenous biodiversity, among other environmental effects. It is important that planting is strictly controlled. We note that wilding conifers are by definition wild so the rule should be specific about what

			<p>species are to be subject to this rule.</p> <p>To assist consents planners processing such a consent a policy around planting of conifers must be introduced. This is sought earlier in our submission.</p>
<b>GSPZ Standards</b>			
GSPZ Standards	General Comment	<p>Introduce for all standards' matters of discretion a matter covering protection of significant indigenous vegetation and habitat of fauna, natural character and maintenance of indigenous biodiversity.</p>	<p>It is not clear for each activity which standards apply. For clarity each rule should list the GSPZ standards that apply.</p> <p>For all matters of discretion where compliance with a standard is not achieved, a matter of discretion should be added, which requires the decision maker to consider protection of significant indigenous vegetation and habitat of fauna, natural character and maintenance of indigenous biodiversity.</p> <p>Particularly for the following standards:</p> <ul style="list-style-type: none"><li>• Boundary setbacks</li><li>• Height</li><li>• Coverage</li></ul>

			<ul style="list-style-type: none"> <li>• Fencing</li> <li>• Outdoor Storage</li> </ul>
GSPZ-S1 Boundary Setbacks	Amend	<p>Amend GSPZ-S1 so it is clear whether internal boundaries are internal property boundaries or structure plan areas.</p> <p>Introduce external boundary setbacks.</p> <p>Introduce setback for Airport Activity buildings and structures from Ecological Open Space Area and external boundaries.</p> <p>Introduce greater setbacks from the Ecological Open Space Area.</p> <p>Remove exclusion for ancillary structures from setback standard.</p>	<p>For clarity the standard should state whether internal boundaries are those boundaries of the Tourist Development, Aiport and Ecological Open Space Areas, or property boundaries within the Glentanner Station Open Space Zone.</p> <p>External boundary setbacks that are not arterial road/other road boundaries are not defined in the standard and should be.</p> <p>Forest &amp; Bird are concerned the aerodome runway could be lengthened or widened without being appropriately setback from the Ecological Open Space Area or external boundaries, which could have an affect on indigenous biodiversity. Further investigation of an appropriate setback should occur.</p> <p>Further, Forest &amp; Bird are concerned that without ecological input, the setbacks are not</p>

			<p>appropriate for managing effects on indigenous biodiversity.</p> <p>Matters of discretion where compliance with boundary setback standards is not achieved must include effects on indigenous vegetation, habitats of indigenous fauna and natural character.</p>
GSPZ-S4 Coverage	Oppose	<p>Amend standard so it is clear whether the coverage standard applies to each of the Structure Plan areas or each property within the zone.</p> <p>Reduce coverage standards to smaller percentage for the purpose of preserving natural character, protecting and maintaining indigenous biodiversity.</p>	<p>It is not clear to us whether the standard applies to each of the Areas within the Structure Plan or each property within the zone. The standard should be clear about this.</p> <p>Regardless of the above, Forest &amp; Bird are concerned with 10% coverage standards given the size of sites. 10% of Lot 2 DP 480112 which contains the aerodrome would be 56,294.7m<sup>2</sup>. Forest &amp; Bird seek further investigation into an appropriate site coverage to preserve natural character, protect indigenous vegetation and fauna and maintain indigenous biodiversity.</p>

GSPZ-S5 Fencing	Oppose	Delete stone walls of up to 1.2m in height from the standard.	Forest & Bird are concerned about habitat fragmentation that could occur through stone walls of up to 1.2m in height.
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Thank you for the opportunity to submit on Proposed Plan Change 30.