

## Hermann Frank

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### Submission re

PLAN CHANGE 23 – RURAL AND NATURAL ENVIRONMENT SUBMISSION ON PROPOSED  
PLAN CHANGE 23 TO THE MACKENZIE DISTRICT PLAN

Trade Competition

I could not gain an advantage in trade competition through this submission

I wish to be heard in regard to my submission.

### Submission details

I generally agree with the proposals of the Plan Change 23, especially to include chapters

1.1. Insert a new ‘Natural Character’ Chapter (NATC) within a new ‘Natural Environment Values’ section, in ‘Part 2 – District Wide Matters’, as set out in the Eplan.

1.2. Insert a new ‘Natural Features and Landscapes’ Chapter (NFL) within a new ‘Natural Environment Values’ section, in ‘Part 2 – District Wide Matters’, as set out in the Eplan.

1.3. Insert a new ‘General Rural Zone’ Chapter (GRUZ) within a new ‘Rural Zones’ section, in ‘Part 3 – Area Specific Matters’, as set out in the Eplan.

I agree with most statements in the Section 32 Report, but would like to highlight the following statements:

Under 5. Issues: The four statements under 5.1 and under 5.2 “By way of comparison, the eastern part of the district has little in the way of landscape protection and no density standards to guide decision making. Therefore, there is limited guidance on the outcomes that are anticipated in the eastern Mackenzie.”

It seems that this has been transferred into policies and rules only in a very limited form.

While I agree with the Objectives and most Policies and Rules, I think a number of them need to be amended.

### **NFL O3 Forestry Management Areas**

The landscape values of Forestry Management Areas are maintained by managing commercial forestry and woodlots.

I do not agree with the name for these areas. As mentioned earlier in the Council document, these areas are usually called Visual Amenity Landscapes. They should not only manage effects of plantations, but also other factors e.g. earthworks, fences, buildings which have effects on landscape values. While a number of submissions might want to have this restricted to forestry, this is not in line with the intention of this category.

Recommendation: These areas should be called Visual Amenity Landscapes.

Change Objective to: The landscape character and visual amenity values of the visual amenity landscapes of the Mackenzie District are maintained or enhanced.

## **Policies**

### **NFL-P1 Protection of Outstanding Natural Features and Landscapes**

Generally the statements seem to be quite weak in regard to **protect** the values within these areas. There is no policy recognising the importance these natural features and landscapes for biodiversity. While this might be covered in other parts of the plan partially, it should be included here as an integral part of these landscapes. This would similar to Point 6 for sites of significance to Maori. Therefore I suggest to include the following points

- Add (from P2): Recognise that there are many areas where development beyond pastoral activities is either generally inappropriate or should be avoided.
- recognising potential effect on natural values, especially At Risk and threatened species and providing protection for identified values for indigenous vegetation and biodiversity

### **NFL-P9 Forestry Management Areas**

see under NFL-O3 further up here and change to Visual Amenity Landscapes, add the following policies (possibly as separate policies):

Only allow activities in Visual Amenity Landscapes, that are consistent with maintaining or enhancing the identified values and characteristics. This includes existing non-intensive primary production, small scale earthworks, maintenance of existing tracks and fences and underground utilities.

Only allow subdivision, use and development including commercial forestry and woodlots within Visual Amenity Landscapes where it can demonstrate that the landscape can absorb the change and the values and characteristics will be maintained or enhanced.

## **Rules**

### **NFL-R1 Buildings and Structures (excluding Residential Units)**

ONF and ONL need to have separate rules here. ONF usually cover a relatively small area as is the case in the proposed ONFs for the Mackenzie District. Any buildings would compromise the values of these **outstanding** features. No new buildings should be allowed in an ONF.

Recommendation: Make buildings and structures a Non-complying Activity in ONFs

Insert similar rule to NFL-P3 for ONF and ONL

There shall be no pastoral intensification or agricultural conversion within the following areas identified on the Planning Maps:

- Sites of Natural Significance

### **NFL-R5 Earthworks**

Again ONF and ONL need to have separate rules. No earthworks should be allowed in ONFs as this would seriously affect the values of these smaller areas. Only Point 1 should be included for ONFs  
Recommendation: Make earthworks Non-Complying Activity in ONL

For ONL: The volume and size of permitted earthworks is far too high. This should be reduced down to at least 100m<sup>3</sup> and 100m<sup>2</sup>. Any earthworks beyond these should be a Discretionary Activity.

Recommendation: Any earthworks over 100m<sup>3</sup> or 100m<sup>2</sup> should not affect the values of the ONL and are a Discretionary Activity

### **NFL-R9 Non-Farm Buildings**

Again should not be allowed in ONF

### **NFL-R10 Commercial Forests and Woodlots**

Support rules, but see NFL-O3

### **NFL-R11 Shelterbelts**

No shelterbelts should be allowed in ONF or only as Discretionary Activity

Support **NFL-R12 and NFL-R13**

## **Rule Standards**

Reference to ONF should be removed here as buildings should not be allowed in ONF generally.

### **NFL-S3 Building Coverage**

This is excessive and should be substantially reduced

## **Maps and extent of Outstanding Natural Landscapes and Features, also of Visual Amenity Landscapes (Significant Natural Landscapes in the landscape study or Forestry Management Areas as in the Plan Change)**

The locations and extents of ONL, ONF and VAL are based on the assessment by Boffa Miskell. It is evident that this has been undertaken in a limited timeframe and with limited input from local knowledge. Therefore the extent of some of these areas does not reflect the actual situation. In my opinion some of the boundaries need to be adjusted to include areas which should be part of this particular landscape. I have undertaken work in some parts of the Eastern Mackenzie District and know some areas quite well. Accordingly I make suggestions for extensions of some proposed areas or as in one case of creating an entirely new ONF.

The most serious case is the omission of an entire landscape feature which is without any doubt the most Outstanding Natural Feature in the Eastern Mackenzie District. This is the Tengawai Cliffs west of Albury, a limestone scarp of about 6 – 7 km length. I also suggest additions to the ONF Raincliff, the ONL Two Thumbs Range and the VAL Albury Range. These suggestions are described in more details in the following attachments:

- a. Proposed ONF Tengawai Cliffs
- b. Addition ONF 3 Raincliff
- c. Addition ONL 2 Two Thumbs Range
- d. Addition SNL 2 Albury Range

H Frank

23 January 2024

Hermann Frank  
Submission to Plan Change 23:

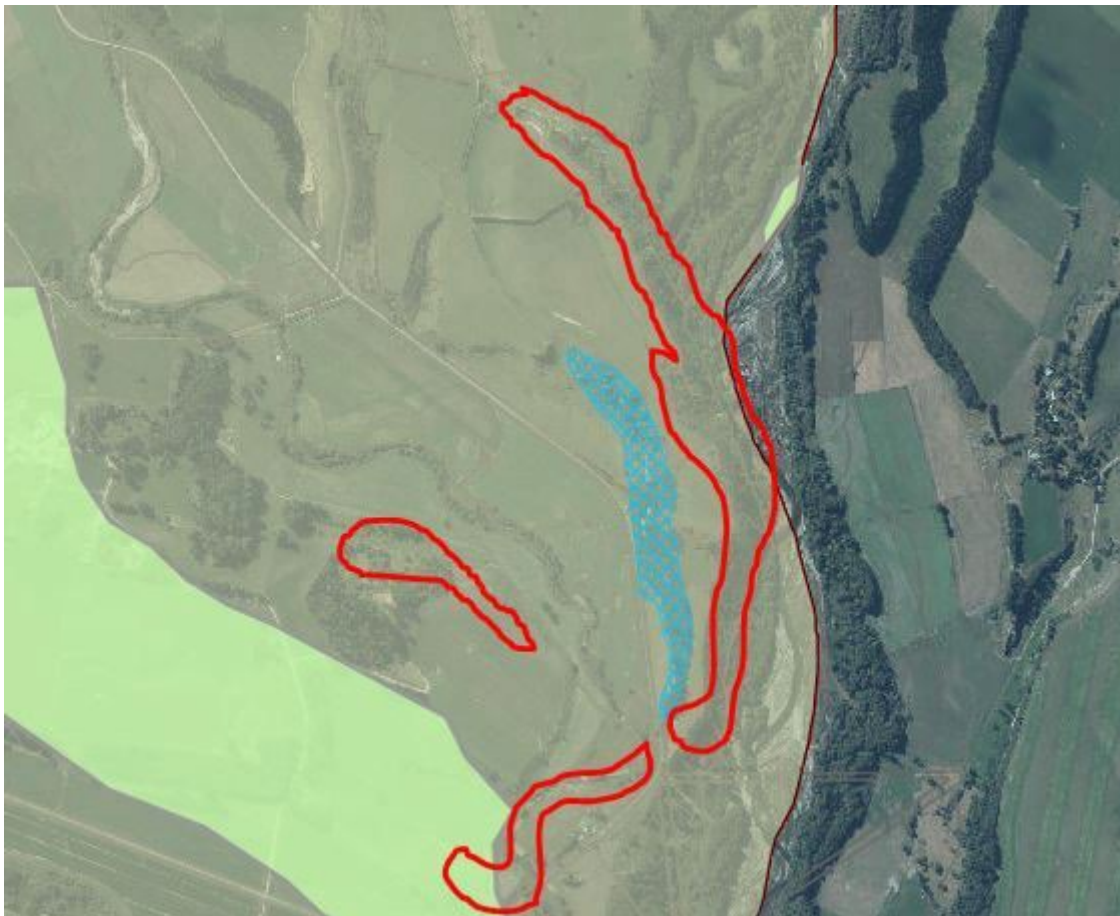
### **Additions to ONF 3 'Raincliff'**

Generally I support the conditions and extent of the ONF 3 and mostly agree with the description. However, there need to be some additions as there are some other outstanding limestone formations in that area.

The first one is on the opposite side of the marked-out ONF i.e. facing north and north-east. These are notable limestone cliffs starting about 400m east of Gudex Road and leading towards the Opuha River and parts of them stretching along the river. The cliffs or parts are visible from a number of viewpoints on Gudex Road and from the north of the river. I attach some photos further down. The northwest part does also have rock art drawings.

The second possible addition is the limestone outcrop where the Raincliff homestead is built on. This outcrop is a very discernible from Middle Valley Road. Smaller outcrops lead right round to Spur Road. The homestead itself could be excluded. The proposal for this addition would need some checking on site and refining.

A map with suggestions for these additions is provided here. The part along the Opuha River might be joined at the south end with the described ONF 3.

















Outcrop with Raincliff homestead



Hermann Frank  
Submission to Plan Change 23:

### **Additions to ONL 2 'Two Thumbs Range'**

Generally I support the conditions and extent of the ONL 2 Two Thumbs Range and mostly agree with the description. However, there needs to be some addition in the area north-east of Kimbell to include some outstanding landscape features in the foothills including noteworthy limestone formations in that area.

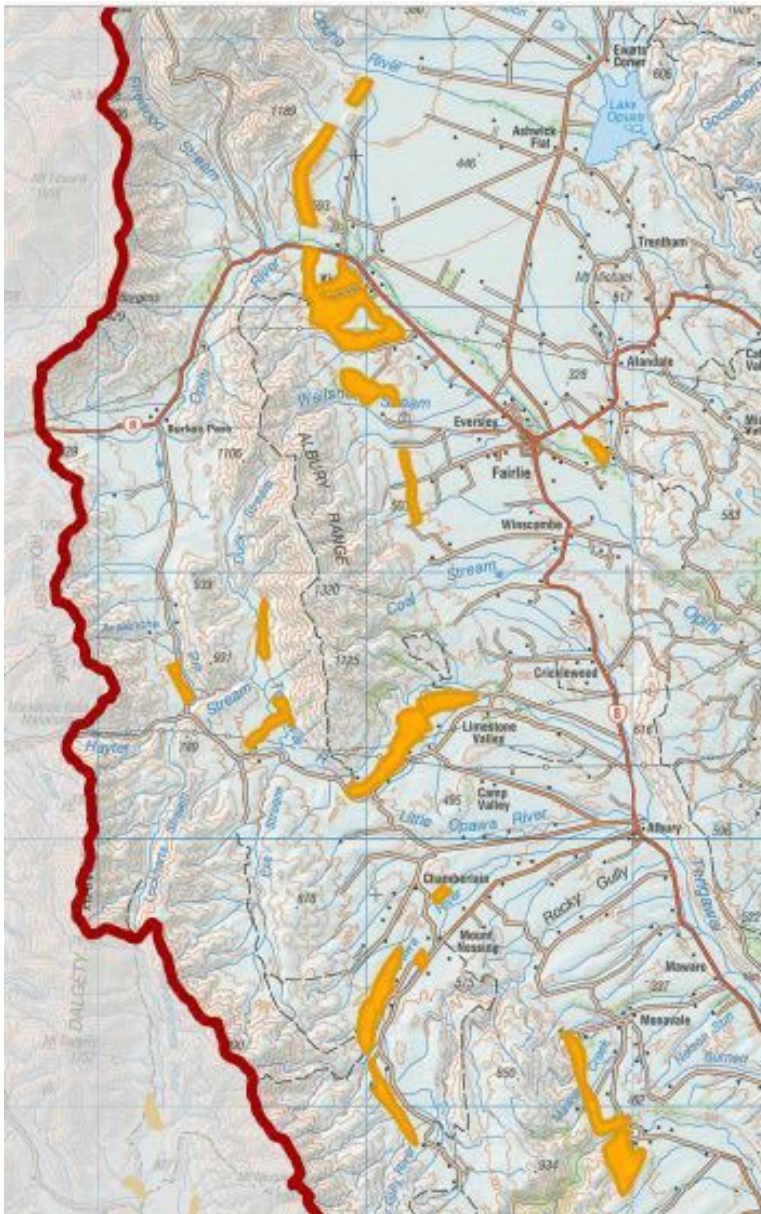
These foothills contain some dramatic features like steep incised gullies and dominant ridges, partly with remnants of native vegetation. They are highly visible from the main road and form a substantial part of this landscape. In addition to this, the hill west of the Stoneleigh Road in parts contains limestone formations. While these are not much discernible from the distance, limestone formations are recognised as distinct and threatened landforms and ecosystems in New Zealand. These landforms, which are considered to be historically rare terrestrial ecosystems, exhibit high biotic diversity, providing habitats for plants and animals, some of which only occur on calciferous soils. Therefore, these important ecosystems are classified as Vulnerable and the indigenous vegetation that occurs here is acutely threatened. I have not been able to access these limestone parts, but it is highly likely that they provide habitat for threatened species due to the remoteness, the limited modification of the environment and the location and direction of limestone areas.

A map with a proposal for these extensions is attached. Exact boundaries need to be better refined. I also include a map of exposed limestone areas in the Mackenzie District which also shows the limestone areas west of Stoneleigh Road.

Note: The larger limestone areas near Kimbell south of the State Highway 8 are not much distinct from a landscape aspect, are less notable and highly modified. They are unlikely to qualify for Outstanding Natural Features, but some smaller areas might meet the criteria for Significant Natural Areas. However, this would need to be verified on site.







Areas of exposed limestone in the Eastern Mackenzie District;  
note two areas north of SH 8 which are mentioned in the text above  
Map source: ECan, OTOP zone

Hermann Frank  
Submission to Plan Change 23:

### **Addition to SNL 2 'Albury Range'**

Generally I support the conditions and extent of the SNL 2 Albury Range and mostly agree with the description. However, there needs to be some addition along the south-east boundary near the Tengawai River. The Tengawai River is an integral part of this landscape section, especially the short, but notable Tengawai Gorge. The Gorge is already included., but generally the boundary should be on the south bank of the river.

The gullies on the west side of the Gorge lead down to the river and most have remnants of native vegetation. The boundary on the west could be slightly tweaked in order to accommodate for current farm tracks.

An extension towards the east below the Gorge is also recommended to include the lower reaches of the Tramway Stream/gully with regeneration of native vegetation. The musterer's hut on the north bank of the river could be excluded.

Another small extension is recommended between the Tengawai River and the Warratah Saddle. The south-facing hillside is quite visible from the Waratah Road and therefore it would make sense to include this side of the hill in the SNL. The noteworthy limestone formations on Duck Stream are already included in the SNL.

A map with a proposal for these extensions is attached. Boundaries need to better defined. Near the Tengawai Gorge this SNL and the proposed ONF 'Tengawai Cliffs' could share a boundary for a short stretch.



Proposed additions to SNL/VAL Albury Range





West end of proposed addition along the Tengawai River



Gullies down to Tengawai River west/above the Tengawai Gorge





View from limestone cliff over Tengawai River below the Gorge toward Tramway Stream



Another similar view over the Tengawai River



Hermann Frank

Submission to Plan Change 23:

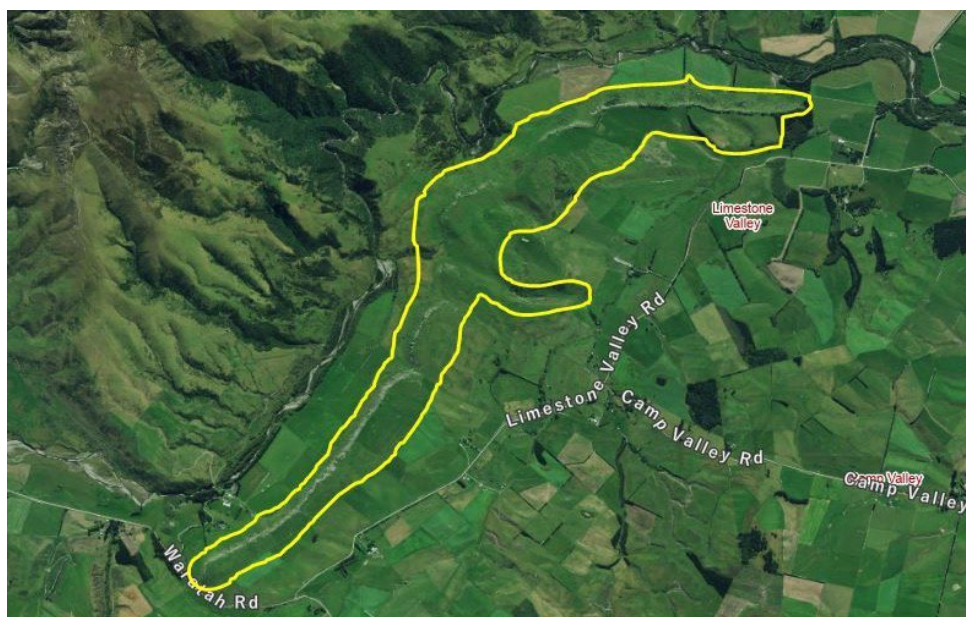
### **Proposed Outstanding Natural Feature 'Tengawai Cliffs'**

An important natural feature in the Eastern Mackenzie District has been overlooked in the Landscape Study. This is the area of the Tengawai Cliffs, an outstanding limestone scarp from a landscape aspect, though it is not so visible from public accessible places. This is by far the most significant and prominent limestone area in the District. Limestone formations are recognised as distinct landforms and ecosystems in New Zealand (Williams et al. 2007; Rogers et al. 2018). These landforms, which are considered to be historically rare terrestrial ecosystems, exhibit high biotic diversity, providing habitats for plants, birds, bats, lizards, invertebrates and micro-snails (Worthy 1997; Frank 2018). However, these important ecosystems are classified as Vulnerable (Holdaway et al. 2012; Wiser et al. 2013) and the indigenous vegetation that occurs here is acutely threatened (Walker et al. 2006; Cieraad et al. 2015)

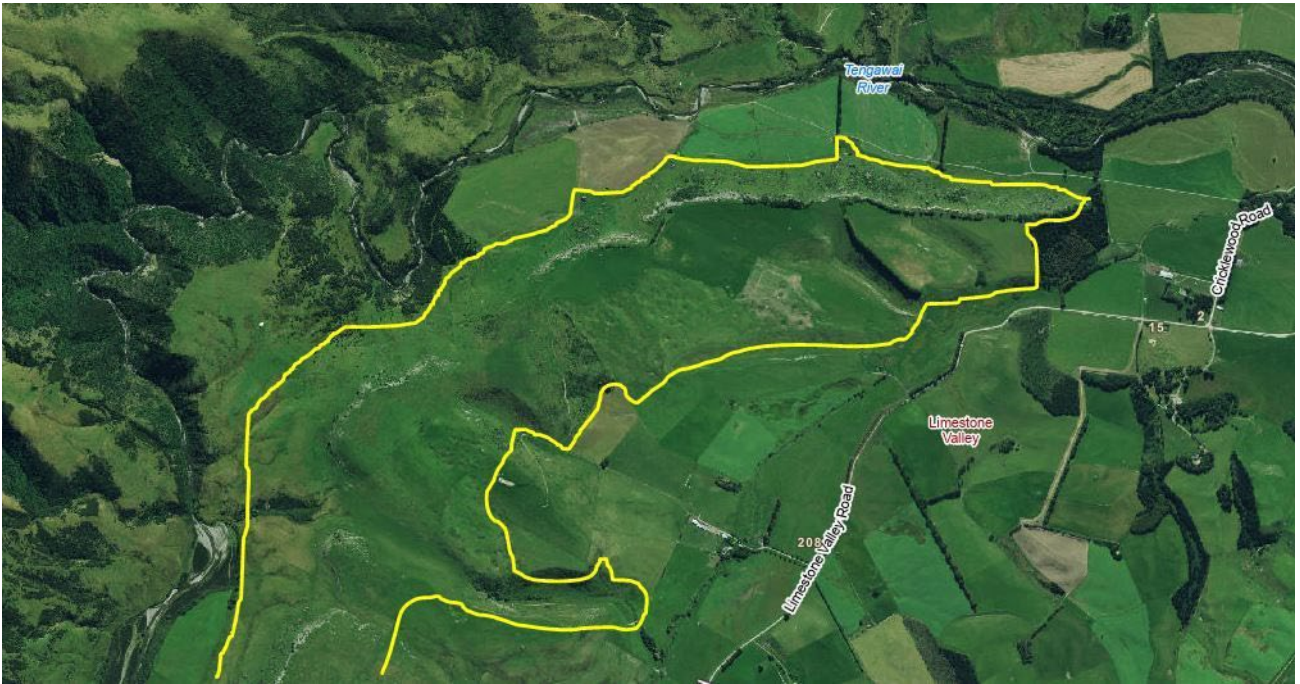
The Tengawai scarp is even more significant for the botanical values found there. Four 'Nationally Critical' plant species occur there, three of them are endemic to that area (Frank, pers. observation). Two plant species are 'Nationally Endangered' and eight taxa are 'At Risk'. Once taxonomic issues are resolved, it is likely that two of the 'At Risk' taxa also will be classified as 'Nationally Critical'. Of the three lizard species present in the limestone habitat, two, the Southern Alps gecko and the Southern grass skink, are classified as 'At Risk'. This is a very high number of threatened species for an area of this size. I have studied two of the endemic plant species in detail and have published a paper about this research (Frank H. 2023. Distributions and Statuses of three highly threatened calcicolous plants in limestone habitats of South Canterbury, New Zealand. DOC Research & Development Series 368).

The area has also some important geological features like an area with numerous sinkholes in the north-east part and a number of rock art sites (as shown in Figure 10 of the Landscape Study). My limestone book (Frank H. 2018. South Canterbury Limestone - Landscape of Dreams - Nature's Treasure Chest. Timaru) has some details and a number of photos. In fact, both the title and the back page show features from there. I attach some photos, but I am happy to send more photos, if this would be helpful.

Therefore I propose a new ONF. Here I attach maps for a proposal of an Outstanding Natural Feature 'Tengawai Cliffs'. The boundary is pretty obvious on the north and northwest side near the Tengawai River. It could be tweaked a bit on the north-east section. One map is more of an overview, the other two show the north part and south part and these need to be joined.





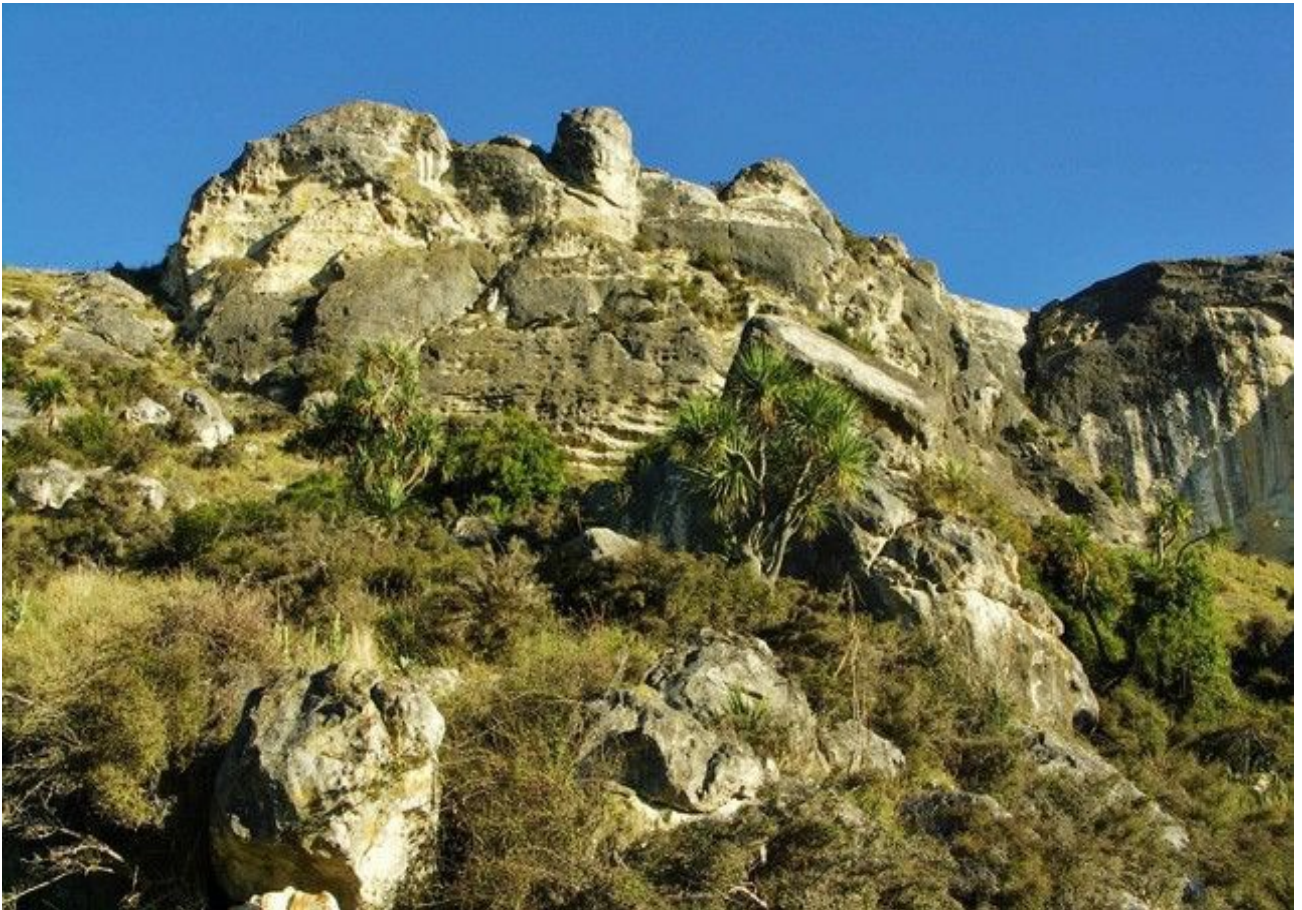


ONF 'Tengawai Cliffs', north



ONF 'Tengawai Cliffs' south

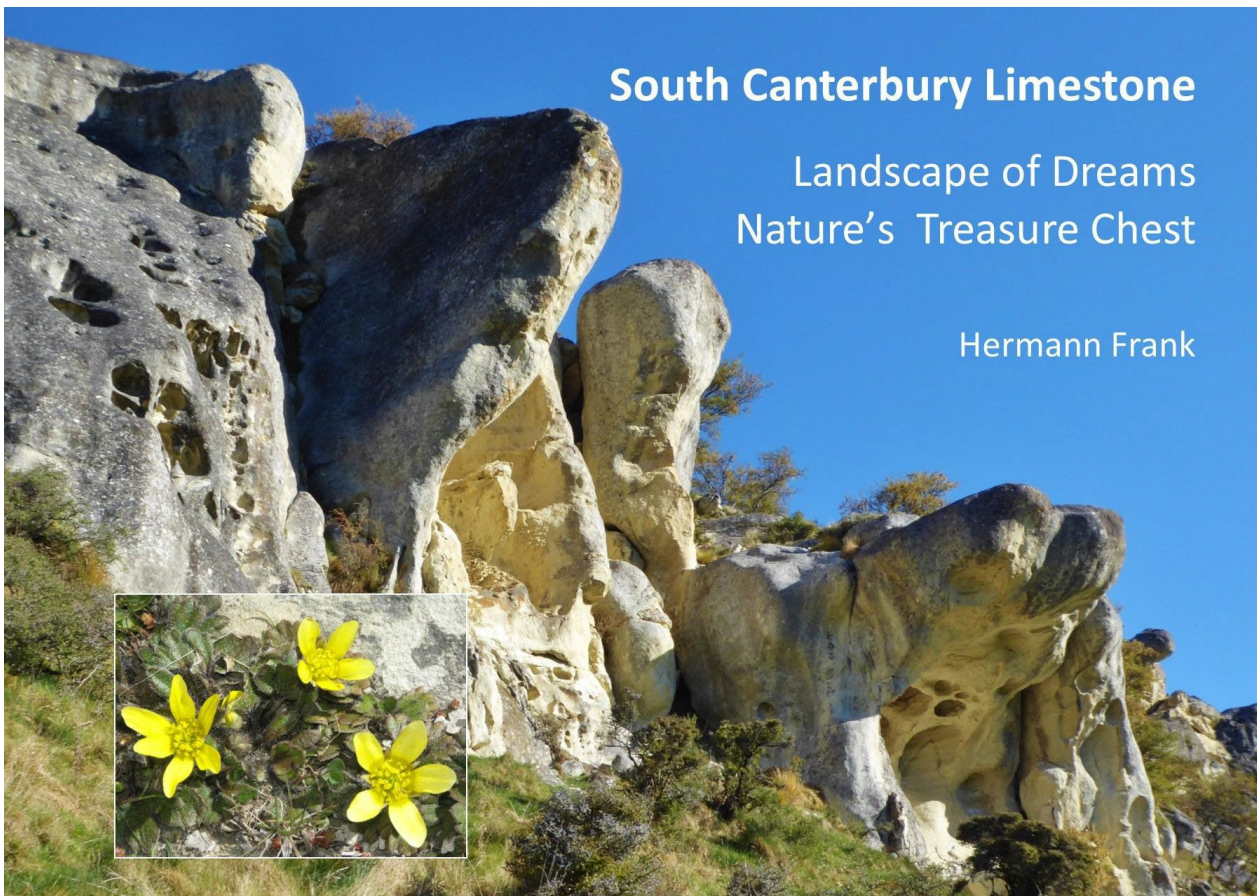












## South Canterbury Limestone

Landscape of Dreams  
Nature's Treasure Chest

Hermann Frank