

## **Summary of evidence re submissions to PC 23 – H Frank**

(also considering s24A report)

### **1. Objectives, Policies and Rules**

- a. the proposed Rules do not meet the Objectives in regard to protection of Significant Natural Landscapes; alternatives can be found in the review of the Timaru District Plan for example
- b. the recommended changes (s24A) to Rules NFL-1, R5, R6 and R12 are supported with one amendment to NFL-R5 in order to allow maintenance of existing infrastructure in an ONF

### **2. Overlays of ONFs, ONL and FMA**

#### **A. Proposed ONF Tengawai Cliffs**

- Limestone ecosystems are classified as historically rare terrestrial ecosystems
- The Tengawai Cliffs are the largest and most prominent limestone scarp in the Mackenzie District with impressive high cliffs, boulder fields and open pavements clearly showing the underlying geology
- The area provides habitat for 14 threatened plant species and three threatened animal species. Three of the plant species are endemic i.e. they only occur here. Historically other species existed e.g. the now extinct laughing owl
- The area still enables further research e.g. evaluation of historical data, unidentified species like microsnails
- The area is highly significant for Maori. At least four sites with rock drawings are known and mittens have been found
- The recommended new ONF goes some way to recognise these values, but “In general the delineation of the ONFs is relatively tight” (Memorandum page 3)
- it omits other features which are a significant part of this landscape and clearly linked to the geological processes which formed this landscape
- The most important feature is an area with a high number of sinkholes (or dolines) which generally only occur in limestone country due to the fact that limestone dissolves relatively easily in water
- even more importantly, high historic, geological and archaeological values are underground where fissures and caves have been formed
- in historic times these sinkholes have acted as traps, mainly for birds (especially flightless birds)
- explorations at the end of the 19<sup>th</sup> century have extracted a substantial number of bones of moa and other birds, now extinct or extreme rare
- only a percentage of these valuable remains have been extracted
- this area at least needs to be included in the ONL Tengawai Cliffs
- generally other areas below and above the cliffs which are part of the same geology and landscape should also be included
- this would also lead to much clearer boundaries

## **B. Proposed extension to ONF Raincliff**

- while to my knowledge no full botanic surveys have been undertaken, a lizard survey in 2008 found two 'At Risk' lizard species present – the Southern Alps gecko and the Southern grass skink in the proposed addition to the ONL
- generally agree with the new assessment, but propose a slight extension to the south of the recommended new part of the ONF to include the full length of this escarpment (see additional information B3/B4)

## **C. Proposed extension to ONL Two Thumbs Range**

- the new assessment is partly supported as it would include the significant limestone outcrops on the west side of the high point of the Berkeley Downs ridge
- these outcrops with a length of at least 560m length and 20-40m height are the highest limestone outcrops in South Canterbury, possibly the lower half of the Eastern South Island
- to my knowledge this area has not been surveyed, but most likely provides habitat for threatened plants and animals
- however, the front range Berkeley Downs as a whole forms an integral part of the southern end of the Two Thumb Range and should be included in the ONL
- the southern part of the Two Thumbs Range and the high ridge of the Berkeley Downs, the ridgeline in particular, form one vista
- this can be seen from various points of SH8, from the Opihi River, from Kimbell and the basin on the north side of the river
- the inclusion of this 'stand out' landscape feature in the ONL as proposed in the submission would best maintain the "Very High" values of this ONL, but a moderate extension (see C 11) would at least include the most important parts and preserve the integrity of this landscape to some extent
- this proposed extension would also lead to much clearer and better defined boundaries of the ONL

## **D. Proposed extension to the SNL/FMA Albury Range**

- the notified boundaries on the south end excluded important landscape features, especially gullies leading to the river, in the wider area of the Tengawai Gorge and had unclear boundaries
- this was partly acknowledged in the new assessment and is supported
- however, a more consistent approach would be to have the river as the boundary on the south side both above and below the gorge
- should the Albury Range remain an FMA, there would be really only one restriction in regard to land use i.e. large forestry plantations,