

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
1.	<p>Environmental Defence Society PO Box 91736, Victoria Street West, Auckland 1042 0274 687778 madeleine@eds.org.nz</p>	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • Imprecise drafting & failure to review relevant rules mean existing exemptions provide loopholes for indigenous vegetation clearance. • There has been an accelerated rate of change in the Mackenzie Basin including reduction in indigenous biodiversity in favour of exotic grasses, enabled by the loophole exemptions and with resultant adverse effects on significant indigenous vegetation and habitats of indigenous fauna • Indigenous biodiversity loss and extensive pastoral intensification is resulting in adverse effects on outstanding natural landscape characteristics and values • The Mackenzie Basin's indigenous flora and fauna is unique and threatened by or at risk of extinction. Adverse effects from vegetation clearance and associated land conversion may be largely irreversible. • Unregulated vegetation clearance under the exemption loopholes risks current planning processes (PC13 and district plan review) directly focused on protection of landscape and indigenous biodiversity being rendered obsolete. PC17 is temporary, and would create regulatory certainty during an interregnum period. • Landowners are not left without remedy as they can apply for consent for vegetation clearance • PC17 is consistent with sustainable management of the Mackenzie Basin. 	YES
2.	<p>Mary Ralston 282 Back Track, Rakaia 7782 027 502 9202 mary.ralston@xtra.co.nz</p>	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • The exemptions to the vegetation clearance rules, 12.1.1(g) and 12.1.1(h) have been used as loopholes for the clearance of large areas of indigenous vegetation in the Basin. 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
					<ul style="list-style-type: none"> • The indigenous vegetation clearance and large scale land conversion has resulted in adverse effects on the outstanding natural landscape characteristics and values of the Mackenzie Basin. • The land clearance has resulted in the loss of habitat for vulnerable and at risk indigenous species unique to the Mackenzie Basin. The loss may be irreversible. • The adverse effects of the land conversion and intensive pastoral intensification is contrary to Chapter 12 of the Regional Policy Statement and s.6(b) & (c) of RMA. • Although PC17 is for a 12-month period only, it will create regulatory certainty until such time as Mackenzie District Plan Change 13 is final, and the district plan review promulgated. 	
3.	Susan Mary Hall 1099 Courtenay Road RD1, Darfield 7571 03-3181506 smahall@xtra.co.nz	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • Indigenous vegetation clearance for large scale intensification of farming has resulted in loss of habitat for unique and at risk bird and invertebrate species. The adverse effects are contrary to Chapter 12 of the RPS and s6(b) and (c) of the RMA. 	NO
4.	Mackenzie Guardians Inc. c/- Postal Delivery Centre Glentunnel 7638 03-3182632 rsnoyink@xtra.co.nz	Support	Whole plan change	PC17 be confirmed Seek the 12 month period be confirmed to provide certainty until PC13 is concluded.	<ul style="list-style-type: none"> • This will close the loopholes which have been used to clear large areas of indigenous vegetation in the Mackenzie Basin. The clearance and large scale land conversion to intensive farming has resulted in adverse effects on the Outstanding Natural landscape characteristics and values and loss of habitat for vulnerable and at risk indigenous species. 	NO

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
5.	Martin & Penny Murray Maryburn Station SH8, Lake Tekapo Private Bag 66005, Fairlie 7949 027-3800130	Oppose	Whole plan change	Allow a viable farming unit	<ul style="list-style-type: none"> • This becomes a breach of our sustainable management covenant. • This would result in a decrease of farm production which inevitably effects a sustainable and financially economical farming business, also effecting employment opportunities and local communities. • Maryburn surrendered 4250ha in Tenure review for that land to be protected and become a dryland park in the Mackenzie Basin, with the balance being kept to be able to make a viable farming unit. 	YES
6.	Federated Farmers PO Box 20448 Bishopdale Christchurch 8543 021 518 271 ajohnston@fedfarm.org.nz	Conditional support	Whole plan change	FFNZ is generally supportive given: - It is a temporary measure and for a defined time period. - It provides an adequate level of protection for indigenous vegetation whilst allowing fundamental farming practices i.e. weed removal and track or fence line maintenance to be undertaken.	<ul style="list-style-type: none"> • The proposed change will require landowners who wish to clear more than 40ha of short tussock, or 10ha of mat/cushion vegetation to obtain discretionary resource consent. The plan guidance states that consent is likely to be granted except where significant areas or habitats are affected - while this is a burden for landowners, it does not necessarily prevent them from undertaking vegetation clearance. • PC17 is an acceptable interim measure, provided any possible extension to the 12-month time frame is publically notified well in advance and all alternatives are reassessed • FFNZ would like clarification whether MDC will be in a position to notify new provisions regarding vegetation clearance arising from the District Plan review by 24 December 2017. If an extension to the proposed time frame is required, how much additional time is MDC likely to add to the 12 months? 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
7.	<p>Royal Forest and Bird Protection Society of New Zealand Inc (Forest & Bird) P O Box 2516 Christchurch, 8140 Attention: Jen Miller</p>	Support	Whole plan change	<p>- Retain the removal of exemptions to rules 12.1.1.g and 12.1.1.h</p> <p>- Provide for the removal of the exemption to apply until such time as a reviewed District Plan becomes operative.</p>	<ul style="list-style-type: none"> • The exemption provided for in 12.1.1.g and 12.1.1.h that apply to the Mackenzie Basin has resulted in an unintended consequence and allowed for extensive areas of land that has significant indigenous vegetation and habitats of some of New Zealand’s most threatened fauna as well as outstanding landscapes being irrevocably destroyed as of right by oversowing and topdressing. • The exemptions are contrary to the Policies and Objectives of the Mackenzie District Plan, the Canterbury RPS and Part 2 of the RMA. • A number of Objectives and Policies relate to the protection and enhancement of the natural values of the Basin, including indigenous vegetation and habitats and landscape values, notably Rural Objective 1 and Policy 1C, Rural Objective 3A and 3B, Rural Objective 4 and Rural Policy 4B. • An exemption to the vegetation clearance on land that has been OSTD at least three times within the last ten years is contrary to the Plan Objectives and Policies that seek to protect significant plants, animals and landscapes. • The exemption to the rules is contrary to RPS Chapter 9 • Policy 9.3.2 recognises four national priorities for protection all of which exist (and are vulnerable to development) within the Basin, these are: <ul style="list-style-type: none"> - Indigenous vegetation in land environments where less than 20% of the original indigenous vegetation cover remains. - Areas of indigenous vegetation associated with sand dunes and wetlands. - Areas of indigenous vegetation located in 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
					<p>“originally rare” terrestrial ecosystem types not covered under (1) and (2) above.</p> <ul style="list-style-type: none"> - Habitats of threatened and at risk indigenous species. • The removal of the indigenous vegetation as a result of OSTD can not only have a devastating impact on ecological values but also on outstanding landscape values. The Basin has been identified as an Outstanding Natural Landscape in the RPS and it is a matter of national importance to protect the values that contribute to the ONL, these include: <ul style="list-style-type: none"> - Natural science values - Legibility values - Aesthetic values - Transient values - Shared and recognised values • OSTD contributes towards the ‘greening’ of the landscape and the changing of the shared and recognised iconic nature of the Basin and other values. The exemption provides for the undermining of these values and is contrary to the objectives and policies of C12 of the RPS. • There is a risk that 12 months will not provide Council with the time it will need to complete and notify the reviewed Plan. Although there is some merit in the removal of the exemption being time bound it would be entirely counterproductive if the exemption was able to be reapplied before an operative plan was in place. 	

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
8.	<p>Colin J Morris 19 Hector Street, RD Coalgate 7673 03-3182643 Liz.weir@paradise.net.nz</p>	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • Concerned about the recent rush to clear land of indigenous vegetation in the Mackenzie Basin, using loopholes in the current plan. • The spate of dairy conversions in the Mackenzie Basin has had a widespread, destructive impact on fragile fauna and flora of The Basin. This rampant land change has also brought about an extreme adverse effect on the landscape. • The Mackenzie Basin is an Outstanding Natural Landscape and what remains of it must be protected from further wholesale slaughter. • Because of the already severe loss of biodiversity in the Basin it is essential to protect what remains. A Plan Change to curb 'sneaky' vegetation clearance is what is needed to enforce protection of biodiversity. • A keen trumper and climber, the Mackenzie Basin is a special place because of its wild, untamed beauty. It is a 'must see' destination for overseas visitors but it will lose its special character, if agricultural intensification and further destruction of the landscape features continues. • People don't visit the Mackenzie Basin to see pivot irrigators and green paddocks. The wide open, unspoilt vista is what attracts people and will continue to attract people once the dairy boom has died, if the landscape can retain its unique natural characteristics. 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
9.	Annett & Michael Hamblett No contact details provided	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • They value the landscape, indigenous flora & fauna, and the waterways & have been shocked at the inappropriate change in the Basin • The exemptions to the vegetation clearance rules, 12.1.1(g) and 12.1.1(h) 'enable the clearance of indigenous vegetation which has significant value and which therefore should receive a degree of protection'. To quote ecologist Dr Susan Walker, the clearance of indigenous vegetation in the Mackenzie Basin is resulting in 'rapid, widespread and permanent harm' to vegetation, the habitats of indigenous fauna, and 'other matters of national importance'. • The land conversion and intensive pastoral intensification enabled by rules 12.1.1(g) and 12.1.1(h) is contrary to Chapter 12 of the Regional Policy Statement and s.6(b) & (c) of Resource Management Act. • Through enabling this clearance, rules 12.1.1(g) and 12.1.1(h) have led to an accompanying loss of habitat for indigenous species including those found only in the Mackenzie Basin. This loss may be irreversible. • The Mackenzie Basin's Outstanding Natural Landscape features and values have been adversely affected by the scale of indigenous vegetation clearance and its accompanying large-scale land conversion. • PC17 will provide certainty until new provisions in the reviewed District Plan are in place. 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
10.	Mr A.G. Talbot 84 Mays Road Christchurch 8052 talbotjones@clear.net.nz 033554409	Support	Whole plan change	PC17 be confirmed	<ul style="list-style-type: none"> • Concerned that exemptions to the vegetation clearance rules 12.1.1(g) and 12.1.1(h) will result in the clearance of indigenous vegetation and wildlife which has significant value and which needs more protection. • The land use development enabled by rules 12.1.1(g) and (h) contradicts Chapter 12 of the Regional Policy Statement and the RMA, s.6(b) and (c). • The ongoing clearance through these rules has led to significant loss of species unique to the Mackenzie Basin. • Extensive land use conversion, primarily for irrigation and intensive agriculture, has had a permanent and significant impact on the Outstanding Natural Landscape of the Basin. This is totally changing the appearance of this unique area as well as destroying native dryland species which have existed since before human settlement. • Requests extend the effect of PC17 until PC13 is resolved. 	NO

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
11.	<p>Department of Conservation RMA Shared Services Private Bag 4715 Christchurch Mail Centre 8140 Attn: Nardia Yozin 027 205 3129 nyozin@doc.govt.nz</p>	Support	<p>Sections as below: 12.1.1.g (Exemptions)</p>	<p>Insert the following or words to the like effect:</p> <ul style="list-style-type: none"> • ... • <i>Any short tussock grassland where the site has been oversown, and topdressed at least three times in the last 10 years prior to new clearance so that the inter-tussock vegetation is dominated by clovers and/or exotic grasses. <u>This exemption shall not apply within the period 24 December 2016 [or notification date] either to 24 December 2017 (inclusive) or until the District Plan contains operative provisions which render this exemption to not be in effect (whichever is the later).</u></i> 	<ul style="list-style-type: none"> • Support measures which address the loss of short tussock grassland in the Mackenzie Basin. • Support the intent of PC17 which seeks to protect short tussock grassland in the Mackenzie Basin and ensures that any vegetation removal of this type will not be undertaken without due scrutiny. • Concerned that the one year (between 24 December 2016 and 24 December 2017) period for which the proposed exemption is effective is not a sufficient period. This is because there is a high likelihood that the Mackenzie District Plan Review, which is currently in the very early stages, may not be complete before 24 December 2017. Therefore, the proposed amendments in Plan Change 17 may not provide continuity of effective protection for short tussock grassland in the Mackenzie Basin in the long 	YES

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
			<p>Sections as below:</p> <p>12.1.1.h (Exemptions)</p>	<p>Insert the following or words to the like effect:</p> <ul style="list-style-type: none"> • ... • <i>Any indigenous cushion or mat vegetation where the site has been oversown, and topdressed at least three times in the last 10 years prior to new clearance so that the site is dominated by clovers and/or exotic grasses. <u>This exemption shall not apply within the period 24 December 2016 [or notification date] either to 24 December 2017 (inclusive) or until the District Plan contains operative provisions which render this exemption to not be in effect (whichever is the later).</u></i> 	<ul style="list-style-type: none"> • Support measures which address the loss of indigenous cushion or mat vegetation in the Mackenzie Basin. • Support the intent of PC17 which seeks to protect indigenous cushion or mat vegetation in the Mackenzie Basin and ensures that any vegetation removal of this type will not be undertaken without due scrutiny. • Concerned that the one year (between 24 December 2016 and 24 December 2017) period for which the proposed exemption is effective is not a sufficient period. This is because there is a high likelihood that the Mackenzie District Plan Review, which is currently in the very early stages, may not be complete before 24 December 2017. Therefore the proposed amendments in PC17 may not provide continuity of effective protection for indigenous cushion or mat vegetation in the Mackenzie Basin in the long term. • To address this the exemption should include a sunset clause which clarifies that the exemption will apply until the Rule has been amended through 	

Mackenzie Lifestyle Limited: Summary of Submissions

#	Submitter Name & Contact	Oppose/Support	Submission relates to	Request	Reasons	Heard?
			<p>Sections as below:</p> <p>Explanation “For the purposes of Rule 12.1.1(g) and 12.1.1(h)”</p>	<p>Add a further bullet point which explains the reason for the delay to the effect of the exemptions in the rules:</p> <ul style="list-style-type: none"> • <i>The intention of the delay to the exemptions in the last bullet point in each of these rules is to stay the application of these exemptions pending the outcome of the Mackenzie District Plan review.</i> 	<ul style="list-style-type: none"> • PC17 should include an explanation for the delay in application of the exemptions in the last bullet points in Rules 12.1.1(g) and 12.1.1(h). 	