

**Point 1.** The first NFL Objective says:

NFL-O1: Protection of outstanding landscape values and of those **natural processes and elements** which contribute to the District's overall character and amenity.

Policy 1 states: Recognise the values of the identified ONF and ONL... and protect these values from adverse effects by: ..

But there is no policy recognising the importance of these natural processes and elements 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. One of the Natural Science criteria for an ONL/ONF is “ecological components of the landscape”.

The s42 report states: “I acknowledge that biodiversity values contribute to the identification of an ONF/L. However, provisions to protect such values are specifically dealt with in other parts of the District Plan (namely PC18).”

As the legal submission by the Department of Conservations elaborates: “The first problem is that chapter 19 refers to significant habitats of indigenous species only once, fleetingly. Otherwise, the chapter is entirely focused on indigenous vegetation clearance.”

NFL-SCHED2 lists — Ecological Components of the Natural Landscape Character of the Mackenzie Basin Outstanding Natural Landscape. Districtwise there should at least some recognition for these ecological components.

In addition, the PC 24 report says under 1.21. The proposed SASM chapter should not be seen as a ‘stand-alone’ chapter of the Plan, as there are provisions in other chapters of the Plan. Consequently, Policy 1. specifically states under Point 6: recognising and providing protection for identified values in Sites and Areas of Significance to Māori”. So here is a point which is also covered by other parts of the District Plan as this intention is even expressed more clearly in PC 24. A point regarding biodiversity values would be very similar to Point 6 for sites of significance to Maori. So to be more consistent, I strongly suggest to include the following point under Policy 1: recognising potential effects on natural values, especially areas of significant indigenous vegetation and significant habitats of indigenous fauna and the protection of these habitats.

There is one important factor to consider: biodiversity values in ONF and ONL areas are often not found in a typical vegetation cover like bush or other higher vegetation. As the legal submission by DOC states: “Vegetation is not always a good proxy for habitat”. For example most of the threatened species, amongst them all four ‘Nationally Critical’ species on the Tengawai Cliffs, are smaller herbal plants.

**Point 2.** Again referring to Objective 1, but also referring to NFL O3 and then Policy P9 which address Significant Natural Landscapes, called Forestry Management Areas in the Plan.

This limits the protection of these areas to adverse effects of commercial plantation forestry. This is a very unusual approach. Other councils take a wider view and consider the effects of other developments on the landscape. In my additional information I gave the example how the Timaru District addressed this. Other councils did it in a similar way. The current Waitaki District Plan review says:

NFL-P4 Inappropriate activities within .... Rural Scenic Landscapes (Note: Rural Scenic Landscapes are identical with SNLs). The Policy continues:

Only provide for subdivision, use and development ..... where it:

1. maintains amenity values or
2. avoids, remedies or mitigates adverse effects on other values of .... Rural Scenic Landscapes.

By the way, the Waitaki Plan states: The natural character of the landscape has changed in recent years as a result of development pressures, plantation forestry, carbon forestry and intensive farming. This is also true in other districts.

**Point 3.** Policy 8 applies to the Mackenzie Basin in regard to Pastoral Intensification and Agricultural Conversion, but Point 2 should also be included in a policy for the Eastern part of the district. It says: “There shall be no pastoral intensification or agricultural conversion within the following areas identified on the Planning Maps: Sites of Natural Significance”. And I want to reiterate, that this would only apply to sites of Natural Significance. This should be addressed in a Rule as well.

I had raised this point in my submission, but I did not find a reference to this in the s42 report.

Point 4. In regard to Rules: I support the changes to Rules ....

**Point 5.** a new ONF Tengawai Cliffs

I agree that only parts are visible from public places (and this most likely is cause that it had not been included in the landscape study), but this is only one of the criteria for an ONF. All other criteria are met without question. Note: the unusually high biodiversity values are not restricted to the cliffs, but occur also in the slopes below and in parts on the backslope.

This assessment omits or does not give sufficient weight to 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.

There is one other area in South Canterbury and this is near the lower Pareora Gorge. These doline fields are designated as geopreservation sites. They are in the geopreservation inventory as 'Pareora dolines' under the number 1137:

**Significance:** Most spectacular sinkhole plains formed in Tertiary limestone in New Zealand.

**Description:** Plateau with sinkholes containing numerous potholes and tomos often with fossil bones.

**Access:** Only visible from middle section of Frenchmans Gully Road (which is a gravel road) and from farm tracks on top of the plateaux. Best appreciated from the air.

All these criteria apply to the doline field on the backslope of the Tengawai Cliffs.

Regarding their inclusion in the ONF, I read excerpts from ECan definition for ONFs. "An outstanding natural feature is usually a landform that is distinct and easily identifiable. It is something that rates as outstanding in at least one of the following values:

Geoscience – the landform, feature or geological site contributes to the understanding of the geology or evolution of the biota in the district, region, New Zealand or the earth

Rarity – the physical process or geological exposure of the feature is rare or unique within the district or region, and few comparable examples exist

Scenic/aesthetic values – the natural feature is visually striking, has scenic beauty, or is iconic "

Again the doline area at Albury Park meets not only one, but all of those criteria.

A few comments in regard to the definition of Naturalness in this context.

The website [/www.environmentguide.org.nz](http://www.environmentguide.org.nz) defines "Naturalness": 'a product of nature'. It may include pasture and exotic tree species but not human-made structures. In order to be 'natural' a feature or landscape is not required to be pristine. There is a spectrum of naturalness and a cultured natural landscape may still be an outstanding natural landscape."

**Point 6.** Proposed addition to the ONF Raincliff

I accept the assessment in the Memorandum and the s42 report. I would suggest a small extension at the south end of the addition.

**Point 7.** Extension to the south-east end of the Two Thumbs ONL

The Berkeley Downs, the ridge and the ridgeline in particular can be seen from various points of SH8, from the Opihi River, from Kimbell and the basin on the north side of the river as shown on photos. I supply some more photos taken from the basin area in a separate file. Though the road could not be accessed at the moment, most likely also from the access road to the skifield

The memorandum and s42 considers this ridge to have a higher level of modification and its east-facing slopes do not appear to contain extensive areas of native vegetation. As outlined in the question of defining the ONF of the Tengawai Cliffs, naturalness does not mean that an area is pristine. The vegetation might have been modified to some degree, but the ridge is seen from many directions with the Two Thumb Range in the background and forms one vista.

An inclusion in this ONL might actually help to prevent further modifications like plantation forestry and vegetation clearance which seems to have happened more recently as the newest Google Earth map suggests.

**Point 7,** the proposed extension to the SNL/FMA Albury Range.

In parts, I agree with the new assessment, but would find it more consistent to use the river as boundary both east and west of the gorge.

Regarding information provided by the landowner of the east part:

- a. there seems to be a misunderstanding. An inclusion in this SNL/FMA is not the same as designation of a Significant Natural Site or SNS
- b. in any case, the way the SNS survey was undertaken was not suitable to detect smaller plants or animals which might be present. Also, the report supplied mentions another previous report which was not provided. It sounded that this original report came to a different conclusion
- c. in the evidence, the possibility of erecting a dwelling on this land parcel is mentioned. This is exactly one of those activities which should not happen in that location
- d. current activities like grazing or making silage can continue

And one other point which is outside the scope of this Plan Change, but should still be considered. A couple of hundred metres below the confluence of the Tengawai River with the Tramway Stream is one of the main intakes for the Timaru water supply. The management of areas upriver and upstream will have implications on the quality of the drinking water sources downstream. This is relevant with the current move to better safeguard the drinking water supply.