



## Submission details

The specific provisions of the proposal that my submission relates to are as follows (please give details)

Please see email attachment

My submission is that

(State in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons)

Please see email attachment.

(please include additional pages as necessary)

I/we have included  [insert number] additional pages

I/we seek the following decision from the Manawatu District Council (give precise details, use additional pages if required.)

Please see attachment for information required by MDC.

## Submission at the Hearing

- I/we **wish to** speak in support of my/our submission [select one]
- I/we **do not wish** to speak in support of my/our submission
- If others make a similar further submission I/we will consider presenting a joint case with them at the hearing

## Signature(s)


Of submitter(s) or person authorised to sign on behalf of submitter(s)



Signature

8/3/2020

Date



Signature

8/3/2020

Date

## Important Information

1. The Council must receive this submission before the closing date and time for submissions on this Plan Change or Variation.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the Plan Change or Variation process.
3. Only those submitters who indicate they wish to speak at the hearing will be sent a copy of the planning report.

For office use only

post       hand delivered

Received at the Council on

date

time

**Objectives and policies**

**NFL-O1** To identify Outstanding Natural Features and Landscapes and Significant Amenity Features within the Manawatū District. Relevant policies 1, 2, 3

Please determine how you evaluated the identification of ONFL under the RMA 32 process of involving the community and consultation of landowners – for example if you cannot access the Mangamako Gorge or see it from a boat/kayak the how was this included?

**NFL-O2** To protect, maintain and enhance the characteristics and values of the Outstanding Natural Landscapes identified in NFL-APP1 from inappropriate use and development. Relevant policies 4, 5, 6, 7, 8, 9

Define inappropriate use and development – include in glossary. This is inoperant to NFL-i1 & i4. I would like to be part of the decision making of this definition.

**NFL-O3** To protect, maintain and enhance the characteristics and values of the Outstanding Natural Features identified in NFL-APP1 from inappropriate use and development. Relevant policies 10, 11, 12, 13, 14, 15, 16

**Should read – removal of the word - protect**

NFL-O3 maintain and enhance the characteristics and values of the Outstanding Natural Features identified in NFL-APP1 from inappropriate use and development. Relevant policies 10, 11, 12, 13, 14, 15, 16

**NFL-O4** To protect the characteristics and values of Outstanding Natural Features and Landscapes and Significant Amenity Features from the fragmentation of land through subdivision of land. Relevant policies 17, 18

Protecting family farms encouraging farm succession rather than larger corporate (purchasing land) will help protect characteristics as landowners need to be recognised for the ONFL current state of appeal. Compensation for owners is required in LOU of inhibiting subdivision development. A free consent process when applying for amenity features and subdivision of relevant land.

Please provide scientific data of the RMA under section 32 on the consultation of landowners and continuing economic impact of the proposed rules and regulations will impact on their business'. Remove the word protect from this.

**NFL-O5** To restore, where appropriate, indigenous plant species to contribute to a healthy functioning ecosystem within all Outstanding Natural Features and Landscapes and Significant Amenity Features. Relevant policies 19, 20, 21

Only ecosystems are indigenous - Please show science stat from RMA under section 32 where this back this up.

1. How can you maintain and enhance a dynamic feature such as cliffs and farmland which has evolved due to erosion/advancing farming techniques?
2. Provide data of original plant species.

The Tasmanian blackwood Trees that were planted (farm forestry) were considered in that industry to be a significant stand in NZ. In 2004, floods destroyed the majority, but some remain. They enhance the area, provide income for the Manawatu district when harvested.

**NFL-06** To maintain and where possible enhance areas of Significant Amenity Features as identified in NFLAPP2. Relevant policies 22, 23, 24

Please show science data from RMA under section 32 of how we can maintain and enhance.

**NFL-07** To protect, maintain and enhance the characteristics and values of the Outstanding Natural Features and Landscapes from the use and development of network utilities Relevant policies 25, 26, 27, 28

**OPPOSE**

**network utilities** – need to provide provisions/the ability for adjacent landowners/landowners to use gravitational potential energy (water included) which is underutilised telecommunication/power as a valuable economic resource.

Please demonstrate evidence of having thought about the long term financial and environment implications involved in this trade off i.e. Preventing future profitable environmentally sustainable energy to keep the cliff looking nice for people driving past at 100km per hour or playing golf.

**Policy**

**In the RMA under section 32 – how was the geological/geomorphological assessed – the Rangitikei cliffs are dynamic and erodes – define the process of formation.**

**NFL-P1** To identify and spatially define outstanding natural features and landscapes consistent with the following factors:

- 1) Natural science factors
- 2) Aesthetic values - **define in glossary**
- 3) Expressiveness (Legibility) - **define in glossary**
- 4) Transient values - **define in glossary**
- 5) Shared and recognised values
- 6) Cultural and spiritual values for tangata whenua
- 7) Historic heritage values.

**NFL-P2** To classify areas as Outstanding Natural Features, Outstanding Natural Landscapes and Significant Amenity Features based on their identified characteristics and values.

Classification was done in consultation with how and who has identified the areas?

**The Mangamako Gorge must be excluded as there is no viewpoint/access from the land/road or river (kayak, walking access as only private land) therefore is irrelevant to be included in ONFL. Only identified from Aircraft. No access allows it to remain in its untouched natural state. Access will only impact on biosecurity issues and ruin the microclimate. What amenity features based/identified characteristics' and values where made and who consulted the landowners?**

**How was the ground access accomplished to identify Mangamako Gorge's as an ONFL area?**

**NFL-P3** To identify the spatial extent of Significant Amenity Features.

OPPOSED - Specify too open need to see reasoning and mapping

To avoid use and development within identified Outstanding Natural Landscapes which diminishes the identified values and characteristics of the areas, including:

- 1) The extensive unbuilt coastal strip along the Manawatū Coastline Outstanding Natural Landscape.

2) The unmodified and continuous indigenous vegetation values and the ridges and hilltops of the Ruahine Ranges Outstanding Natural Landscape.

OPPOSED - Define/specify what is meant by 'characteristics of the areas'

**NFL-P5** To avoid the significant adverse cumulative effects of use and development on the identified characteristics and values of Outstanding Natural Landscapes.

Define cumulative effects in glossary. Under RMA 32 what is the officers report provided to the effected community and how are they consulted.

**NFL-P6** To avoid adverse effects on the characteristics and values of Outstanding Natural Landscapes as far as reasonably practicable, and where avoidance is not practicable, remedy or mitigate adverse effects on the characteristics and values of those landscapes.

OPPOSED - Unclear of meaning. A document of best practice for all ONFL. Workshops for effected landowners/manages are needed. Followed adjacent landowners that affect ONFL areas who will have ongoing effects on the ONFL areas.

**NFL-P7** To have regard to the adverse effects from use and development on the characteristics and values of Outstanding Natural Landscapes when viewed from public spaces.

OPPOSED – must allow landowners to improve/maintain network utilities from cables, pipes wind turbines, telecommunications, to maintain and improve on/allow for future unseen technology without economic impact or inhibit growth.

**NFL-P8** To avoid large scale earthworks within Outstanding Natural Landscapes.

OPPOSE – leave to horizons under one plan.

**NFL-P9** To allow passive recreation, conservation and customary activities within Outstanding Natural Landscapes where this does not diminish the characteristics and values of those Landscapes.

OPPOSED – poses serious health and safety. Not acceptable for private property. Also poses biosecurity threat, damaging landscape, plant and ecosystems, lowers business security and posse's danger to humans as we have dangerous animals.

**NFL-P10** To enable the use and development within Outstanding Natural Features where it is demonstrated that the identified characteristics and values of the area are protected, maintained or enhanced.

OPPOSED to this as a rule. A wide range of activities should be permitted. Should be controlled only through a free consent process.

**NFL-P11** To recognise the existing farming activities within the Rangitikei River Outstanding Natural Feature includes existing farming activities and enable continuation of these activities where they do not adversely affect the characteristics and values of the feature identified in NFL-APP1.

exclusion of; where they do not adversely affect the characteristics and values of the feature identified in NFL-APP1.

Should read

NFL-P11 To recognise the existing farming activities within the Rangitikei River Outstanding Natural Feature includes existing farming activities and enable continuation of these activities.

**NFL-P12** To avoid the significant adverse cumulative effects of use and development on the identified characteristics and values of Outstanding Natural Features.

Define accumulative effects in glossary.

**NFL-P13** To avoid adverse effects on the characteristics and values of Outstanding Natural Features as far as reasonably practicable, and where avoidance of is not practicable, adverse effects on the characteristics and values are remedied or mitigated.

Define the meaning of 'adverse effects on the characteristics and values of Outstanding Natural Features'. Would like to be involved in definition.

Looks similar to NFL-P6 unclear of difference.

**NFL-P14** To ensure new buildings, structures and earthworks do not compromise or degrade the identified characteristics and values of Outstanding Natural Features.

Pattern of building - Please define best practices. Free consent process for landowners.

**NFL-P15** To discourage large scale earthworks within the Outstanding Natural Features.

In balance with ANZAC Cliffs in Palmerston North, Wind Turbines for power supply, etc.

Retain to build existing infrastructure, of erosion on existing tracks that need to be reinstated to the extent it is strictly Geotech sound. Needs to allow free consent process which is rapid In cases of natural disasters, river control to prevent farmland or farm infrastructure from damage.

**NFL-P16** To allow passive recreation, conservation and customary activities within Outstanding Natural Features where this does not affect the characteristics and values of the Feature.

OPPOSE - this imposes on landowners' rights to privacy and the ability to run a business/business security, serious health and safety issue.

**NFL-P17** To avoid subdivision within Outstanding Natural Landscapes unless the fragmentation of land does not compromise or degrade the characteristics and values of the Landscape identified in NFL-APP1.

OPPOSE – limiting economic opportunities for farming families to achieve farm succession. Allows corporate entities to purchase family farms. Free consent process for affected landowners.

**NFL-P18** To manage subdivision within Outstanding Natural Features and Significant Amenity Features to protect the characteristics and values identified in NFL-APP1 are not adversely affected by fragmentation of ownership arising from subdivision.

OPPOSE – limiting economic opportunities for farming families to achieve farm succession. Allows corporate entities to purchase family farms. Free consent process for affected landowners.

**NFL-P19** To control the removal of indigenous vegetation from Outstanding Natural Features and Landscapes and Significant Amenity Features identified in NFL-APP1 and NFL-APP2.

OPPOSED – the one plan covers this.

**NFL-P20** To restrict the introduction of exotic vegetation species, including forestry, within Outstanding Natural Features and Landscapes and Significant Amenity Features.

OPPOSED - already considered outstanding even with exotics, black wattles, Tasmanian blackwood's, poplars, we need to maintain a balance – outside of regulatory framework – in conjunction with landowners. What's the economic impact analysis/data on farmers by limiting species/forestry opportunities? Should there be a biosecurity incident where an unwanted pest enters the limited gene source of the ONFL ecosystem for example the *Lymantria dispar*, (Asian gypsy moth). What impact and

analysis has been done to understand the financial/environmental impact on landowners/local businesses?

**NFL-P21** To encourage and enable the protection of existing native vegetation and the restoration and planting of Significant Amenity Features with locally sourced plant stock.

Opposed - This will cause eco-scouring – local resilience is essential. An active farmer builds gene source for biology or economic resilience in plant stock to avoid genetic reticence in our bush for example kauri dieback, myrtle rust, etc

**NFL-P22** To enable the continuation of existing stock grazing within Significant Amenity Features where this does not compromise the characteristics and values identified in NFL-APP2.

SHOULD READ

NFL-P22 To enable the continuation of existing stock grazing within Significant Amenity Features.

A free consent process will build a strong culture of compliance. This will keep weeds such as Old Man's Beard, Lupins, gorse, etc. to a minimum. Good practice guidelines will encourage grazing during High flow times minimising impact on the environment.

**NFL-P23** To provide for use and development within Significant Amenity Features where the activity does not compromise the characteristics and values identified in NFL-APP2.

Please define 'use and development' in glossary best practice guidelines

**NFL-P24** To discourage drainage, native vegetation removal and earthworks in the Significant Amenity Features.

Leave this for Horizons One Plan there is no need for drainage to be in policy.

**NFL-P25** To enable the operation, maintenance, replacement or minor upgrading of existing network utilities located within or adjacent to Outstanding Natural Features and Landscapes and Significant Amenity Features.1

SHOULD READ

**NFL-P25** To enable the operation, maintenance, replacement or minor upgrading of existing or future network utilities and landowner owned located within or adjacent to Outstanding Natural Features and Landscapes and Significant Amenity Features.1

**NFL-P26** To avoid significant adverse cumulative effects of network utilities within Outstanding Natural Features and Landscapes.

Define is glossary best practice guidelines

**NPL-P27** To protect the characteristics and values of the Outstanding Natural Landscapes defined in NFL-APP1 by avoiding the use and development of new network utilities in these areas unless:

- 1) There is no practicable alternative location.
- 2) The infrastructure is of national or regional importance, including the National Grid.
- 3) The development does not diminish the characteristics and values of the identified area.2

OPPOSED as this directly infringes on economic and opportunities on farm. Limits resilience adaptability on nations individual farming families.

1. Please show the economic modelling projected financial impact.
2. Where is this dealt with in the RMA 32 – the data potential of future loss of opportunity



### 3. Limits CDEDA economic growth

#### **Rules**

Rules in this chapter apply to all activities within the areas identified as being Outstanding Natural Features and Landscapes, and Significant Amenity Features as spatially defined in Appendix 5.1. The Chapter needs to be read in conjunction with Chapter 3 District Wide Rules as Rules applying to earthworks and network utilities may also apply. Where a network utility is to be located within an Outstanding Natural Feature or Landscape or a Significant Amenity Feature and requires a resource consent then the Objectives and Policies of both Chapter 3 and 5 are applicable.<sup>3</sup>

Under this policy there is no non-regulatory approach to methods mentioned. Setting up of committee primarily made up of landowners composed of a diverse group of landowners ensuring effected people have their say producing a 'best practice' document/set of guidelines would ensure a buy in and fair outcome for landowners.

#### **Permitted Activities**

The following activities are Permitted Activities within Outstanding Natural Features and Landscapes and Significant Amenity Features: **NFL-R1** the use and maintenance of existing tracks and walkways for passive recreation, conservation, and customary activities.

**OPPOSED** – strong dispute public access making further land available to public. Also, in natural disasters significant earthworks and in large events tend to be less likely.

**NFL-R8** Buildings and structures within the Totara Reserve Regional Park no greater than 50m<sup>2</sup> in area. There should be no distinction between Totara Reserve Regional Park. All entities should be given the same set of rules. Owners and guardians of this area are being favoured.

**NFL-R10** Earthworks involving less than 50m<sup>3</sup> associated with a permitted activity listed above.

Guidance Notes:

1. Earthworks within an Outstanding Natural Feature and Landscape except as provided for above are a Non-Complying Activity under Rule 3D.4.5.
2. Earthworks are also regulated by the Manawatū-Whanganui Regional Council and a resource consent may be required under the rules of the One Plan.

Leave this for Horizons to control as is already their job under the one plan.

**NFL-R11** Development consistent with the Reserve Act status or relevant Management Plan for the specific Outstanding Natural Feature or Landscape. For these activities, the Council has restricted its discretion to considering the following matters:

Why not all activity restricted discretionary make them controlled, making discretionary restricted non-complying make discretionary.

**MD4** Effects on the overall amenity and ecological value resulting from any proposed vegetation clearance.

Exclude impacts from business as usual; farm to forestry, forest to farm and forestry and farm forestry

**NFL-R12** Buildings greater than 50m<sup>2</sup> and less than 200m<sup>2</sup> in area within the Totara Reserve Regional Park.

There should be no distinction between Totara Reserve Regional Park. All entities should be given the same set of rules