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Dear Matthew

PROPOSED PLAN CHANGE 65 – HORIZONS REGIONAL COUNCIL SUBMISSION

Thank you for the opportunity to make a submission on the Manawatū District Council's (MDC) Proposed Plan Change 65 (PPC65): Outstanding Natural Features and Landscapes (ONFL).

At Horizons Regional Council (Horizons) we have key role in making the region a great place to live, work and play. Our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

In terms of environmental planning, our integrated planning document, the One Plan, sets out four keystone environmental issues for our region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

In this submission we consider the proposed district plan changes in the context of giving effect to the regional policy statement components of Horizons' One Plan, and that these changes are not inconsistent with our regional plan provisions¹. Further, this submission also covers Horizons' role as a resource user within areas identified as ONFL or significant natural areas; and specifically the potential impacts of the provisions on our ability to manage Tōtara Reserve Regional Park (Tōtara Reserve).

Horizons generally supports the Proposed Plan Change as these proposals are considered broadly consistent with the issues, objectives and policies on the One Plan. While Horizons generally supports the overall policy and regulatory approach, there are aspects of the provisions that we seek to amend from our perspective as resource user, while recognising MDC's obligation to give effect to higher order policy direction. These relate primarily to our role in the management of Tōtara Reserve, and are set out further below.

Horizons also notes that the proposed National Policy Statement for Indigenous Biodiversity is currently under consultation, and that promulgation of this national direction may have an impact on this, or future, plan changes.

¹ Section 75 of the Resource Management Act 1991

Relationship between PPC65 and the One Plan

The One Plan Regional Policy Statement sets the policy framework for management of ONFL in the region. Specifically, these matters are addressed in Objective 6-2, and Policies 6-6 and 6-7. Horizons therefore supports the mapping of the district's ONFL, as this gives effect to part of Policy 6-6. We understand that Mr Hudson has identified, mapped and assessed five Schedule G ONFL that include area within the Manawatū District (on page 11 of his report). A comparison table is included at the end of this letter for your reference.

We acknowledge Mr Hudson's categorisation (on p. 15) that the criteria he has used correlate to those set out in Table 6.1 of Policy 6-7, and that view that this is consistent with the requirements for the identification of ONFL, their characteristics and spatial extent, as set out in the One Plan.

With regard to the proposed district plan provisions, Horizons supports the following objectives and policies as they give effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7:

- Objectives NFL-01 to NFL-03; Chapter 3A Objective 3
- Policies NFL-P1, NFL-P6, NFL-P7; Chapter 3A Policies 3.2 and 3.3.

We believe that the proposed rules will enable MDC to implement the effects management hierarchy set in One Plan Policy 6-6(a) and (b) and reflected in Policies NFL-P6, NFL-P7, and 3A 3.2 and 3.3. However, we do not unreservedly support all of the rules proposed in the plan change.

Horizons acknowledges that the intent (in relation to indigenous biodiversity) is to provide a framework for MDC to consider amenity and visual-related effects. Horizons considers this is an appropriate approach, which is consistent with the allocation of responsibilities for managing indigenous biodiversity habitats in the region set out in One Plan Policy 6-1.

However, we are concerned that the scope of the types of effects is not referred to within the policy or rule framework – for example, policies refer simply to restricting removal or protecting existing indigenous biodiversity. We would support amendments that ensure clarity and avoid duplication of regulation between the district and regional plan provisions.

Horizons requests that Policy NFL-P16 and Rule NFL-R2 be amended to explicitly convey that planting should use indigenous species appropriate to the ecological area. Not all indigenous species, or locally sourced indigenous species will be appropriate; for example, karaka is a readily available species that is considered a pest plant and would not be appropriate. We therefore suggest the following amendments:

Policy NFL-P16: "To encourage restoration and planting with locally sourced indigenous species appropriate to the ecological area within of Outstanding Natural Features and Landscapes and Significant Amenity Features."

Rule NFL-R2: "Planting and restoration of indigenous vegetation within Outstanding Natural Features and Landscapes and Significant Amenity Features using indigenous species appropriate to the ecological area."

We support the clear direction in the NFL chapter that activities involving ONFL are regulated by Chapter 3A Network Utilities. However, we suggest that there should be greater clarity as to which provisions the repowering of a windfarm would be assessed against, to ensure that it would not be considered a 'replacement' under Rule 3A.4.2 a.

We also support Guidance Note 2 below the NFL permitted activity rules; however, we suggest that this should be expanded to refer to vegetation clearance and activities affecting indigenous biodiversity habitat, including indigenous vegetation, which Horizons also regulates. There is likely to be considerable overlap between ONFL and areas that meet the description of at-risk, rare, or threatened habitat under the One Plan, and are subject to strict regulation.

Tōtara Reserve

The proposed policy framework supports the protection and maintenance of values and characteristics of ONFL, indigenous vegetation, and the enabling of passive recreation, conservation and customary activities. These policies are particularly relevant to Horizons' management of Tōtara Reserve.

As a resource user, we note our support for the permitted activity rules which will generally enable us to carry out a range of activities that will protect and maintain the values and characteristics of this ONF, particularly those relating to Natural Science – Biological/Ecological, and Associational – Recreational and Shared/Recognised.

However, we seek clarification that Rule NFL-R1 enables Horizons to carry out maintenance to reinstate sections of tracks that have washed out, enabling repair and remarking of otherwise potentially dangerous areas to be completed without delay. We consider that this is consistent with Policy NFL-P8 which states "To enable passive recreation, conservation and customary activities within Outstanding Natural Features and Landscapes identified in NFL-APP1 where this does not adversely affect the characteristics and values of those areas"; noting that, for the Tōtara Reserve, public walking tracks are a feature of the Associational – Recreation characteristic.

Further, the summary highlights that the area is "A natural feature that is easily accessible by the public appreciation of natural features. Maintenance of tracks and public facilities should be facilitated and not discouraged through the planning process" (NFL-APP1, p. 42; emphasis added). It should be noted that this activity occurs on the flat river terrace area where, in our view, natural character values are not high.

Horizons acknowledges that the intent of Rule NFL-R10 is to be an enabling provision, recognising that management plans set out planned development. We would prefer that the activity status be less restrictive, particularly in relation to formation of new tracks in Tōtara Reserve, which are strongly supported by the description of Associational – Recreation characteristic:

"Public walking tracks, picnics areas, fishing, swimming holes, and camping grounds are contained within the reserve. One of these walks includes the 'Fern Walk', which was developed to encourage Manawatū residents and visitors to the region to venture into the outdoors. Maintenance and improvement of these facilities should be encouraged."
[Emphasis added]

This activity does not involve removing canopy vegetation. There would be limited land disturbance (a small digger may be used occasionally, at most) and vegetation disturbance of the understory, in an area up to 2 metres in width. This would occur under the canopy and would be unlikely to have a significant impact on the visual characteristics of the ONF.

We note the direction at the beginning of the Rules section of the Natural Features and Landscapes chapter that earthworks are provided for the Chapter 3D provisions. Horizons seeks clarification in Rule NFL-R10 that 'development' includes associated earthworks as an ancillary activity.

Horizons notes that on page 42 of the ONF10 – Tōtara Reserve in NFL-APP1, the Associational – Historical characteristic describes Camp Rangī Woods as being “in farmland at the northern end of the reserve.” This is misleading; while the Reserve as a whole is surrounded by farmland, the campsite sits within the Reserve. We request that this description be amended as follows; “...and is ~~in farmland~~located at the northern end of the reserve.” We also note that the description of the Natural Science – Biological/Ecological characteristic (p. 41) includes a description of a community engagement project trialling ‘wētā hotels’. We request that this sentence be deleted as it is no longer accurate or relevant.

In summary, Horizons:

- generally supports the Proposed Plan Change insofar as it gives effect to relevant One Plan Regional Policy Statement provisions, in particular around ONFL
- notes its support for the following in particular:
 - mapping of ONFL in the district plan, as this gives effect to One Plan Policy 6-6 in part
 - Objectives NFL-O1, NFL- O2, NFL-O3, and Chapter 3A 3
 - Policies NFL-P1, NFL-P6, NFL-P7, and Chapter 3A 3.2 and 3.3
 - Clear direction that network utilities in ONFL are to be considered under Chapter 3A
- seeks that the proposed provisions relating to indigenous biodiversity be amended to make more explicit the intent to consider effects relating to matters such as amenity and visual characteristics
- requests the following amendment to Policy NFL-P16: “To encourage restoration and planting with locally sourced indigenous species appropriate to the ecological area within of Outstanding Natural Features and Landscapes and Significant Amenity Features.”
- requests the following amendment to Rule NFL-R2: “Planting and restoration of indigenous vegetation Outstanding Natural Features and Landscapes and Significant Amenity Features using indigenous species appropriate to the ecological area.”
- seeks clarification that the repowering of windfarms would not be considered as a ‘replacement’ network utility under permitted activity Rule 3A.4.2 a.
- seeks that Guidance Note 2 for NFL permitted activities be expanded to refer to vegetation clearance and activities affecting indigenous biodiversity habitat, including indigenous vegetation
- requests that the Associational – Historical characteristic description for ONF10 – Tōtara Reserve be amended as follows: “...and is ~~in farmland~~located at the northern end of the reserve.”
- requests that the final sentence in the Natural Science – Biological/Ecological characteristic description, referring to ‘wētā hotels’, be deleted as it is inaccurate
- seeks clarification that Rule NFL-R1, “maintenance of existing tracks and walkways for passive recreation” includes reinstatement and remarking of sections of tracks that have been washed out
- requests that the activity status for creating new tracks consistent with Reserve Act status or relevant Management Plan for the specific ONFL be a less restrictive activity status than restricted discretionary
- seeks clarification in Rule NFL-R10 that ‘development’ includes associated earthworks as an ancillary activity

or any further, alternative or consequential relief that achieves this outcome.

Horizons reserves the right to be heard in relation to this submission. If others make a similar submission, Horizons would consider making a joint presentation to the hearing panel.

Yours sincerely



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APPENDIX

Comparison of Schedule G and proposed ONFL areas:

One Plan Schedule G (Table G.1)	Manawatū District Plan Proposed ONFL
(i) Rangitikei River and river valley from Mangarere Bridge (approximate map reference NZMS 260 T22:488-496) to Putorino (approximate map reference NZMS 260 T22:315-315), and from Mangarere Bridge (approximate map reference NZMS 260 T22:488-496) to the confluence of Whakaurekou River and Ohutu Stream (approximate map reference NZMS 260 U21:714-691)	ONFL3 - Rangitikei River
(j) The Ruahine Forest Park (land administered by the Department of Conservation)	ONFL1 – Ruahine Range (including forest park & ridges)
(l) The series of highest ridges and highest hilltops along the full extent of the Ruahine and Tararua Ranges, including within the Forest Parks described in items (j) and (k)	ONFL1 – Ruahine Range (including forest park & ridges)
(m) Manawatu Gorge, from Ballance Bridge to the confluence of the Pohangina and Manawatu Rivers, including the adjacent scenic reserve	ONFL13 – Manawatū Gorge
(n) Parts of the Coastline of the Region, particularly the Akitio Shore Platform, Castlecliff to Nukumaru coastal cliffs, Foxtangi Dunes, Hokio Beach South Dune Fields and Santoft parabolic dunes	ONFL2 – Manawatū Coastline