

26 November 2021

QEII submission on Proposed Waimakariri District Plan

Clause 6 of Schedule 1, Resource Management Act 1991
RMA Form 5

To: Waimakariri District Council
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By email: developmentplanning@wmk.govt.nz

1. Submitter details:

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2. This is a **submission** on the **Proposed District Plan** for Waimakariri District Council.
3. QEII **could not** gain an advantage in trade competition through this submission.
4. QEII **does not** wish to be heard in support of this submission.
5. QEII **would** consider presenting a joint case with other submitters, at a hearing, who make a similar submission.

We welcome the opportunity to review and provide feedback on the Waimakariri District Council's Proposed District Plan (WDP). We appreciate the early engagement that Council staff had with us in the formation of this plan. We have made a small, focused submission in relation to provisions in the District Plan that will impact the values protected with QEII in the district.

In partnership with private landowners, QEII plays an important role in biodiversity conservation in the Waimakariri District (WD). We work alongside private landowners to place covenants on their land to protect areas with open space values, in perpetuity. Our Regional Rep for the area, Miles Giller, facilitates our work on the ground through trusted relationships with landowners.

There are 21 registered covenants in WD, protecting approximately 505 hectares of privately owned land, with more at varying stages of the registration process. There are many more areas of indigenous biodiversity in the district in need of protection.

Specific provision	Support/ Amend/ Oppose	Reason for submission	Relief sought
Definitions			
Significant Natural Area	Support	QEII strongly supports the inclusion of Unmapped SNA in the SNA definition. This ensures that sites that are inadvertently missed from the mapping exercise, or sites that develop into having SNA-worthy values during the life of the plan, are not unprotected, meaning the RMA obligation to protect these values is achieved.	Retain provision as written.
ECO – Pūnaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity			
ECO-O1 – Ecosystems and indigenous biodiversity	Support	QEII supports this as the overriding objective for this section of the plan. Prioritising both protection and restoration/enhancement will give the best chance for native biodiversity in the district to thrive.	Retain provision as written
ECO-P2 – Protection and restoration of SNAs	Support	We acknowledge and appreciate the intention of WDC to continue working with QEII on protection and restoration of SNAs in the district, as recognised in this policy and elsewhere in the plan. We welcome further conversations with Council on how this could be better achieved.	Retain provision as written
ECO-P4 – Maintenance and enhancement of other indigenous vegetation and habitats	Support in part	QEII is in favour of any policy requiring continued assessment of indigenous vegetation that may later be found to meet the criteria as SNA. However, QEII does not support the proposition in ECO-P4 2. b. that because the Oxford Ecological District, Torlesse Ecological District,	Retain provision but remove ECO-P4 2. b., affording these three ecological districts into the same status as those in ECO-P4 2. a.

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		and Ashley Ecological District, have larger amounts of indigenous vegetation remaining, some clearance of that vegetation may be acceptable. This is inconsistent with the other provisions of this chapter and with the obligation on Council to ensure protection and maintenance of indigenous biodiversity in the RMA and should not be retained.	
ECO-R1 – Indigenous vegetation clearance within any mapped SNA or unmapped SNA	Support	<p>We support the limits on indigenous vegetation clearance provided by this rule where clearance is only permitted in QEII covenants (and other legally protected areas) for protecting, maintaining, restoring, or accessing the SNA's ecological values.</p> <p>This ensures that clearance is not unintentionally permitted through a blanket exception for activities permitted by covenant deeds.</p>	Retain provision as written
ECO-R2 – Indigenous vegetation clearance outside any mapped SNA or unmapped SNA	Support in part	Aside from our earlier comments objecting to the lesser protection for indigenous biodiversity in the Oxford Ecological District, Torlesse Ecological District, and Ashley Ecological District, QEII supports this provision.	Amend by having ECO-R2 1.-3. applying to the entire district rather than separated by ecological districts.
ECO-R3 – Planting of indigenous vegetation	Amend	<p>QEII submits that permitted activity status for planting of indigenous vegetation should be restricted to eco-sourced plants only.</p> <p>We suggest that the plan could have a provision for non eco-sourced planting, however this should be a discretionary activity and still be limited to species naturally occurring in the relevant ecological district. This would be consistent with, for example, the Porirua District Council plan currently in development.</p>	<p>Amend as follows:</p> <p>Activity status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. planting shall be <u>eco-sourced</u>, of an indigenous species naturally occurring (either now or historically) within the

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			<p>relevant ecological district in which the planting is to take place.</p> <p>Non eco-sourced native planting within an SNA could be a discretionary activity.</p>
ECO-R4 – Irrigation infrastructure near any mapped SNA	Amend	<p>QEII submits that the setback provided by this rule should apply to all mapped SNA regardless of whether they are protected by QEII covenants.</p> <p>While the covenant may enable QEII to address detrimental impacts of adjacent irrigation infrastructure, we would prefer that the plan not provide a default position for QEII covenanted areas that is more permissive than for any other mapped SNA.</p> <p>QEII otherwise supports the requirement for a 20-metre setback for irrigation infrastructure.</p>	<p>Amend as follows:</p> <p>Activity status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> any new irrigation infrastructure shall be set back a minimum of 20m from any mapped SNA that is not part of a registered protective covenant under the Queen Elizabeth the Second National Trust Act 1977.