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| DDPR_feedback_0074s |  |
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| Response Date       | Aug 31 22  |
| Notes               |  |
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| Q1                  | Select the chapter you want to provide feedback on                                 |
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| Q2                  | In general, to what extent do you support the contents of this chapter?            |
|                     |  |
| Q3                  | Objective/Policy/Rule/Standard reference:  |
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| Q4                  | Feedback/Comments  |
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| Q5                  | Objective/Policy/Rule/Standard reference:  |
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| Q6                  | Feedback/Comments  |
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| Q7                  | Objective/Policy/Rule/Standard reference:  |
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| Q8                  | Feedback/Comments  |
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| Q9                  | Objective/Policy/Rule/Standard reference:  |
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| Q10                 | Feedback/Comments  |
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| Q11                 | supporting documents?  |
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| Q12                 | If you need more space, or have any other general comments, please leave them here |
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**Submission to the Waitaki District Council**

Draft Waitaki District Plan Feedback

One of the goals of the Waitaki Whitestone Geopark Trust is to promote protection and enhancement of Waitaki's natural assets and ensure appropriate protection, curation and accessibility for key Geopark sites.

We acknowledge that legislative measures were enacted to help to ensure protection of features and landscapes deemed of significance and that the legislative measures arose because of situations, or concerns, that sufficient protections would otherwise not be enforced.

However, we believe that the ultimate goals of both the district and the Trust – protection and sustainable development from our diverse and often unique geology – will be best achieved through continued discussions with landowners where these geological treasures are located. We believe that no responsible landowner actively seeks to destroy genuine heritage, nor do they wish to wantonly disregard the interests of the community they live within.

It is our view that the Trust's vision "where we all come together as kaitiaki [guardians] of the land and its stories" – through research, education and tourism – will be best achieved through continuing to build relationships with landowners.

The response from the Trust here includes a number of questions, seeking to obtain clarification on a number of matters. We have an obvious and clear desire to see that the important, and often unique, geological features of our district are safeguarded. It is expressly our view that this happens with consultation and agreement with landowners.

## **1) Feedback regarding earthworks within areas identified as geosites**

### **1.1 EW-R4 – Earthworks for conservation activities within sensitive environments – permitted if not exceeding 25m<sup>2</sup> over 3 years (plus other allowances)**

Where the WDC definition –

*"Conservation activities means the use of land and/or buildings for an activity undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic, cultural and/or ecological values of a natural or historic resource (for example; fencing and restoration planting). It includes ancillary activities which assist to enhance the public's appreciation and recreational enjoyment of the resource (for example; access tracks, interpretative signs, visitor facilities and vehicle parking)."*

Could we please have clarification as to what protection would be offered to the actual geosites within these 'sensitive environments' from such permitted earthworks.

### **1.2 EW-R4 – Earthworks for conservation activities (note conservation activity definition above) within sensitive environments does not allow for earthworks for the maintenance or repair of existing and lawfully established tracks etc, yet this is allowed under NFL-R4.**

Could we please have clarification as to why is this when both sites are of the same environmental value category?

- 1.3 Earthworks: Could you please clarify whether earthworks consents take into account subsequent permitted activities that may result at a geosite. For example – granting an earthworks consent may then allow NFL-R1 (where building and structures (excluding fences) on or within an Outstanding Natural Feature or Landscape – underground building is permitted).

Could we please have clarification on the following matters:

- a) Whether all earthworks classified as an ONF/ONL/SNF would require consent or in what instances would this not be required
- b) Which rules controlling earthwork activities have precedence re: a geosite that is an ONF/SNF and also in the Coastal Protection Zone
- c) How do the following rules work together for geosites that fall within two or more categories of value?
  - a. EW-R2 – Repair and maintenance activities within or outside of a sensitive environment
  - b. EW-R4 – Earthworks for conservation activities within sensitive environments
  - c. EW-R7 – Earthworks within a sensitive environment
  - d. NFL-R4 – Earthworks on or within Outstanding Natural Features of Landscapes, Significant Natural Features or Rural Scenic Landscape

## **2) Feedback regarding geosites that have been identified as Significant Natural Features (SNF)**

### 2.1 Schedule for SNF

The plan review classifies SNF's as:

*“Significant Natural Features and Rural Scenic Landscapes, which are of local importance to the District and are sometimes termed ‘amenity landscapes’”(WDC Chapter Natural Features and Landscapes)*

There is no schedule within the draft plan for SNF's. Because of this, it is not clear exactly what values WDC considers each geosite classified as an SNF holds. Is a schedule of sites identified as SNF available (just as schedule 7 outlines the values of those sites identified as ONF/ONL)?

### 2.2 Hutchisons Quarry

Hutchisons Quarry geosite has been classified as an SNF in the draft plan. The scoping work that fed into the draft plan identified this site as having associative value of 'very high' and overall value of 'high'.

Schedule 7 of the draft plan (pg 1068) states

*"If a natural landscape or feature has at least one value in the 'very high' range, it is categorised as 'outstanding' and protected under section 6 of the RMA"*

With this in mind, could clarification please be given as to why Hutchison is classified as an SNF rather than an ONF?

### **3) Feedback regarding the Heritage Chapter**

There are a number of geosites that have been classified as Heritage items in the draft plan. The Heritage Chapter of the plan appears to refer to heritage buildings rather than natural sites. Could we please have clarification as to what protection is offered to geosites under the Heritage rules of this plan review.

### **4) Feedback regarding Natural Hazards**

#### **4.1 Tsunami hazards at the lakes**

[Natural Hazards in the Waitaki District](#) states that

*"Tsunamis are a series of powerful waves created by a disturbance in the ocean or a lake, like an earthquake, landslide or a volcano. Tsunamis travel long, low and fast in deep open ocean but when they hit shallow water near land they slow down and bunch up into shorter, larger waves."*

4.1.1 Why have tsunami evacuation zones not been plotted in the lakes area given the above information?

4.1.2 Why have tsunami hazard areas for the lakes not been plotted on the District Plan Draft Map as they have been for the areas of the coast?

#### **4.2 Tsunami hazards at the coast**

4.2.1 Only some areas of the coast appear to have been mapped as tsunami hazard areas – is this because the mapping is incomplete or because the other areas are not considered to be in a hazard area or because of another reason?

#### **4.3 Landslides and alluvial fans**

4.3.1 [Natural Hazards in the Waitaki District](#) details landslides and alluvial fans are mapped in the Otago region only of the Waitaki District. However, landslide information is not included in the Waitaki District plan review (only alluvial fans are) – why is this?

Note – there are obvious rock falls at some geosites – including the documented failure at Takiroa ([GNS 2010](#)), and Earthquakes, and other geosites of limestone cliffs.

4.3.2 There are alluvial fans in the Canterbury region near to or adjacent to the lakes – these have not been mapped – why is that, and have they been identified as a natural hazard?

**5) Feedback regarding Outstanding Natural Features**

Kokoamu Bluff is a geosite that has been classified as an ONF under the draft plan – but is missing from schedule 7. Can we please have this made available.

*31 August 2022*