

24 August 2026

Timaru District Council
PO Box 522
Timaru 7940
Attention: Patrick O'Toole

Resource Consent No. 102.2026.59.1 response to request for further information

Kia ora Patrick

Thank you for your request for further information dated 29 July 2026 (the RFI, copy attached to this letter as Attachment 1). You have indicated that you also provided input to Environment Canterbury's RFI. Our response to that request was provided to the processing planner, Incite Limited, on Wednesday 19 August, and a copy is included with this letter as a separate attachment to the covering email.

TDC question

1. Indigenous Vegetation Clearance

Please provide:

- *area of indigenous vegetation clearance by identified vegetation type;*
- *species list;*
- *mapping of clearance areas;*
- *confirmation whether clearance is limited to pohuehue for Rule ECO-R2 purposes;*
- *ecological assessment of effects arising from indigenous vegetation removal.*

Response to question

The following discussions provide responses to the points raised in the RFI. Regarding the fourth request point, this response indicates that Pohuehue will not be the only species removed.

Almost all indigenous vegetation removal is associated with wetland margin species. Otherwise, the terrestrial area is dominated by exotic grass species. However, two individual indigenous plants have been identified on the margins of No. 2 drain. These plants will be removed.

Wetland vegetation

This has been assessed in the Wetlands Science Advice (the wetland report) attached to the consent application as Appendix 7.

Two wetland(s)/wetland complexes have been identified as containing indigenous plants, and will be fully or partly cleared through the proposed earthworks. These are a stormwater pond associated with the Farm Brands New Zealand (FBNZ) rendering plant, and two excavated areas to its south (the pit-derived wetlands).

FBNZ retention pond

Wetland area: 0.1ha, area to be lost: 0.1ha

This is a small circular constructed wetland, built 10-15 years ago as a stormwater retention pond. It will be completely reworked, and replaced with a similar facility that partially overlaps the footprint to the west, to allow for the new drain alignment to pass east of it. The wetland report states that this wetland:

*presents shallow water with floating Azolla rubra (Figure 11) and is not considered ecologically significant.*¹

Isolated individual rush plants are also growing on the banks of this wetland. The wetland location and character are shown below.



Figure 1: FBNZ wetland (Source: wetland report Figure 11)

Pit-derived wetlands

Wetland area: 2.14ha, area to be lost 0.5ha

These are two distinct wetland areas that naturally formed following excavations approximately 10 years ago. The wetland report describes these areas as follows:

Set within a series of cut drains and exotic grassland dominated by couch (Elytrigia repens) and cocksfoot (Dactylis glomerata), the isolated wetland extents present areas of open water and Juncus rushland. Areas of raupō (Typha orientalis) and crack willow (Salix fragilis) also occur. Other native wetland species occurring include bachelor's button (Cotula coronopifolia), giant rush (Juncus pallidus), sharp spike sedge (Eleocharis acuta), and swamp sedge (Carex virgata).

*Given the reduced extent of indigenous vegetation within the Low Plains context, the areas of raupō vegetation are considered ecologically significant.*²

Earthworks and vegetation removal will partially overlap with these wetlands as the alignment passes through their eastern extents (Figure 2 and Figure 3 below). An estimated 0.5ha of rushland may be removed.

¹ Wetland report p 26

² Wetland report p 25



The raupō reedland, which is identified as ecologically significant and will be avoided as far as practicable. If works in that area is unavoidable, plants will be relocated to somewhere suitable onsite to support their survival.

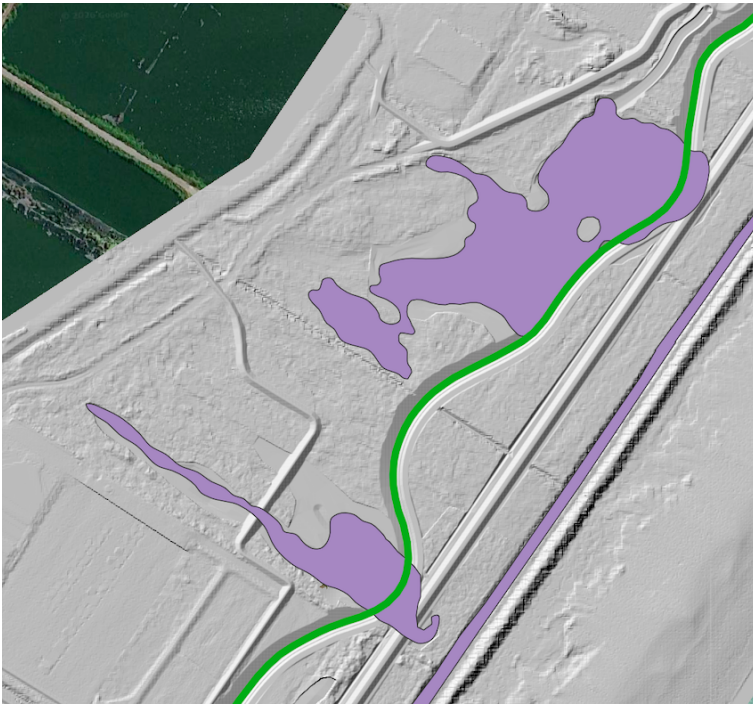


Figure 2: Existing pit-derived wetland extents (purple) and new drain alignment (green)

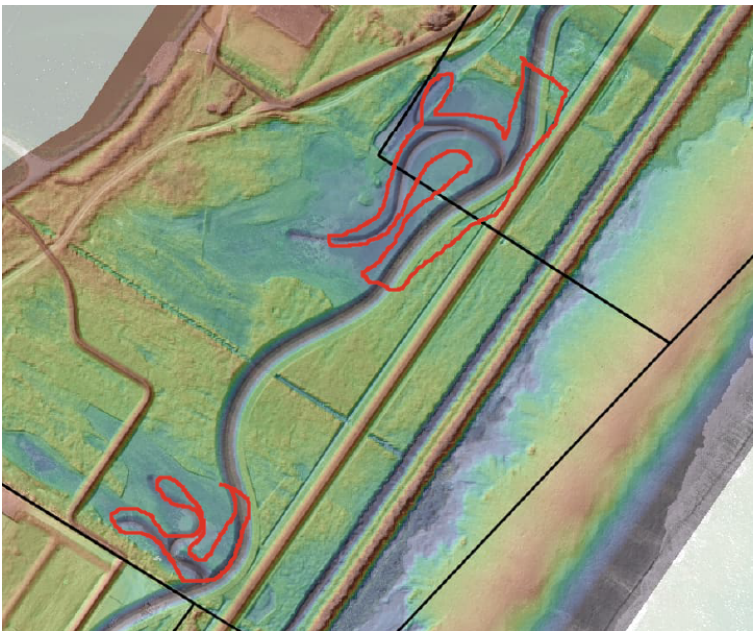


Figure 3: Anticipated earthworks extents in pit-derived wetlands (red).

Other plants

As shown in Figure 4 below, one cabbage tree and one flax are present on the south bank of number 2 drain where the connection of the realigned and existing main drain alignments will occur. These plants will be removed during construction and this is not considered to be significant.



Figure 4: Two indigenous plants on number 2 drain (Source: Internal Environment Canterbury document)

Ecological assessment:

The ecological effect of vegetation removal is discussed above.

The proposal includes a commitment to establish 2ha of indigenous vegetation with an order of 12,000+ indigenous plants already made (as shown in Table 1). Although the final plant numbers will vary depending on availability, this demonstrates that significantly more plants will be established than what may be damaged or removed. As a result, there will be a net gain in indigenous vegetation throughout the site.

Overall, the effects arising from indigenous vegetation removal are considered to be less than minor.



Table 1: Plants on order for placement following works

Plant type	Number ordered
Carex spp. (secta, geminata, litorosa, virgata)	4,147
Schoenoplectus tabernaemontanii (kuawa)	2,795
Phormium tenax (harakeke)	3,025
Austroderia richardii (toe toe)	1,777
Juncus spp. (all rushes)	1,032
Typha (raupō)	900
Plagianthus divaricatus (mākaka)	321
Cordyline australis (tī kōuka)	86
Cyperus ustulatus (giant umbrella sedge)	568
Apodasmia similis (oioi)	454
Myoporum laetum (ngaio)	300
Isolepis prolifera and Ranunculus glabrifolius (waoriki)	113

We trust that this information enables processing of the applications to proceed, and welcome further discussion on any matters.

Ngā mihi



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022 367 546



Jolene Irvine
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Attachment 1

Timaru District Council request for further information



Wednesday 29 July 2026

Canterbury Regional Council – Rivers section
PO Box 345
Christchurch 8140

Via Email: myles@environmentmatters.co.nz and jolene.irvine@ecan.govt.nz

Dear Myles and Jolene,

Resource Consent No. 102.2026.59.1
Section 92 Request for Further Information
Canterbury Regional Council
Seadown Drain & Stopbank Realignment (GLOBAL) -

Timaru District Council has reviewed your resource consent application and pursuant to section 92(1) of the Resource Management Act 1991 (the Act), requests the following further information in respect of the above application:

1. Indigenous Vegetation Clearance

Please provide:

- area of indigenous vegetation clearance by identified vegetation type;
- species list;
- mapping of clearance areas;
- confirmation whether clearance is limited to pohuehue for Rule ECO-R2 purposes;
- ecological assessment of effects arising from indigenous vegetation removal.

The provision of the above information will help the consent authority to better understand the proposed activity, its effect on the environment and the way any adverse effects on the environment might be avoided, remedied or mitigated.

In accordance with section 92A of the Act you must within 15 working days of the date of this request, take one of the following options:

- provide the information; or
- inform the consent authority in writing that you agree to provide the information; or
- inform the consent authority in writing that you refuse to provide the information.

If you agree to provide the information Council will subsequently set a reasonable time within which the information must be provided and inform you of this date in writing.

Please note that failure to provide the information requested or failure to comply with the time limit could result in your application being declined.

In accordance with section 88C of the Act, the processing of your application will be placed on hold from 29 July 2026 until:

- we have received the requested information; or
- we have received confirmation that you do not intend to provide the information; or
- the time limit Council has set to provide the requested information has lapsed.

If you have any queries regarding this matter, please do not hesitate to contact me at the contact details listed below.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. O'TOOLE', is shown within a rectangular box.

Patrick O'Toole
Intermediate Planner

e. patrick.otoole@timdc.govt.nz

p. 03 684 0376