

## Chapter: ECO – Ecosystems and indigenous biodiversity

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
<a href="#">141.150</a>	ECO – Ecosystems and indigenous biodiversity			<p><i>Horticulture and Biosecurity</i></p> <p>██████ seeks that the District Plan include provisions for removal and disposal of infected material in the event of an incursion of unwanted organisms under the Biosecurity Act 1993, as District Plans can be a regulatory hurdle to rapid response to such incursions.</p> <p><i>Biosecurity risks to primary production activities are significant and could have serious impact on both urban and rural communities, particularly the production of food. If an incursion of an unwanted organism was unable to be appropriately managed due to regulatory barriers in the district plan it could have significant impact on the rural economy.</i></p> <p><i>It should also be noted that biosecurity is not just a rural production issue as unwanted organisms can also affect the conservation estate and indigenous biodiversity – such as the recent incursion of myrtle rust.</i></p> <p><i>There needs to be active management to ensure that threats do not enter the country and if they do that pest incursions are able to be addressed.</i></p> <p><i>While biosecurity is generally managed under the Biosecurity Act, there is an interface with the RMA so the Plan has a role to play in respect of managing biosecurity risks.</i></p> <p><i>Regional Councils develop plant and animal pest management strategies that address known pests that are present in NZ. However unwanted organisms are not currently found in NZ so are not identified in regional pest management strategies or the National Pest Plan Accord.</i></p> <p><i>In the event of a biosecurity incursion of an unwanted organism a rapid response to manage spread</i></p>	

*is necessary. Vegetation removal, burial, burning, spraying of material are methods that may be used, including in riparian areas.*

*It became evident through the PSA incursion in the kiwifruit industry that District Plans could be a hurdle in such responses so [REDACTED] now seeks provisions to ensure that such hurdles do not exist in district plans.*

*The Biosecurity Act does not override the RMA unless an emergency is declared by the Minister. There has never been an emergency declared, even with PSA or fruit fly incursions. In other situations, a declaration is made by the Chief Technical Officer of Ministry of Primary Industries (MPI). However, this declaration does not override the RMA so the District Plan rules need to be complied with and district plan rules need to be met in terms of disposal of infected material. Given the urgency required it is not practical to have to obtain resource consent. Therefore, provisions need to be included in the Plan to enable disposal or treatment of infected material to be undertaken in response to a biosecurity incursion of an unwanted organism. The table below provides a high-level overview what we seek.*

<b>Objective</b> :	To minimise the risk of biosecurity incursions in the district and enable response to any biosecurity incursions.
<b>Policy:</b>	<p>Enable disposal of material infected by unwanted organisms for biosecurity purposes and treatment of areas to manage incursions of unwanted organisms.</p> <p>Add the following explanation in the Plan:</p> <p>A Biosecurity incursion could have devastating effects on the wellbeing of the district, particularly the horticultural industry. While incursions are managed under the Biosecurity Act, Council has a role in ensuring that land use activities do not increase the risk in facilitating incursions and to ensure there are not regulatory barriers to the management of incursions, such as burial or removal of infected plants or animals.</p>

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<a href="#">100.18</a>	ECO – Ecosystems and indigenous biodiversity	ECO-P3 Anticipated activities	General	<p><i>ECO-P3 Oppose. The policy is too narrow in its focus, only allowing for removal of indigenous vegetation where it is causing imminent danger.</i></p> <p><i>The plan ought to provide for activities which may result in the removal of individual indigenous plants, which do not affect the overall ecological integrity of an indigenous ecosystem or area. This approach is necessary to encourage landholders to retain and to restore or enhance indigenous biodiversity on private land by providing them with flexibility to undertake land uses within those areas. It is also necessary to achieve the purpose of the Act.</i></p>							
<a href="#">100.19</a>	ECO – Ecosystems and indigenous biodiversity	ECO-P7 Protection of significant natural areas	General	<p><i>ECO-P7 We recognise the duty to protect sites which are significant under s6(c) of the Act. However, this policy as written is opposed because it is impossible for any landholder to ascertain whether and how much of their land meets these criteria for significance without an ecological assessment. It is difficult to ascertain whether this policy achieves the purpose of the Act.</i></p> <p><i>While the protection of significant sites is a duty under s6(c) of the Act, that section is subject to achieving the purpose of the Act. Therefore, any such protection must still enable people to still provide for their economic and social well-being, including making reasonable use of their farmland.</i></p>							

<a href="#">100.20</a>	ECO – Ecosystems and indigenous biodiversity	ECO-P8 Avoidance of pest spread risk	General	<p><i>ECO-P8 oppose in part. The policy as written is confusing. Under the Biosecurity Act 1993, a person cannot plant or propagate a species which is identified as a pest under the Regional Pest Management Plan.</i></p> <p><i>If the intent is to control species that are prone to wilding spread but may not be listed as a pest species in the Regional Pest Strategy, it may be less confusing to avoid using the term ‘pest.’</i></p> <p><i>Suggested wording: Avoid planting exotic plant species which are prone to wilding spread.</i></p>	
<a href="#">118.31</a>	ECO – Ecosystems and indigenous biodiversity	ECO-R1 Clearance of indigenous vegetation	General	<p>█ generally supports Rule ECO-R1 to the extent that the Rule provides for vegetation clearance in certain circumstances, including where there is a danger to utilities when located in an SNA. █ considers that the Rule should be further expanded to provide for the operation, maintenance and upgrading of the National Grid in order to give effect to Policies 2 and 5 of the National Policy Statement on Electricity Transmission and to align with the National Environmental Standards for Electricity Transmission Activities as follows:</p> <p><i>“Activity status: Permitted</i></p> <p><i>Where:</i></p> <p>...</p> <p><i>PER-X</i></p> <p><i>The vegetation clearance is carried out by █ to provide for the operation, maintenance, repair and upgrading of the National Grid, including access to National Grid support structures.”</i></p>	
<a href="#">100.21</a>	ECO – Ecosystems and indigenous	ECO-R3 Clearance of indigenous	General	<p><i>ECO-R3: oppose in part. These setbacks are excessive i.e within 50m of a wetland. The National Environmental Standards for Freshwater 2020, only requires 10m. Why TDC is requiring five times the setback is unclear and appears arbitrary and unjustified.</i></p>	

	biodiversity	vegetation within specified areas			
<a href="#">100.22</a>	ECO – Ecosystems and indigenous biodiversity	ECO-R4 Clearance of trees in the long-tailed bat protection area	General	<p><i>ECO-R4: It is unclear if the ability to remove trees for safety reasons is covered, and if not, the requirements should be similar to those for notable trees.</i></p> <p><i>This clarity could be gained through including in R1 “where subject to ECO-R4”, as currently proposed for SNAs and R3.</i></p>	
<a href="#">118.32</a>	ECO – Ecosystems and indigenous biodiversity	ECO-R5 Clearance of indigenous vegetation in a significant natural area	General	<p>██████ does not support non-complying activity status applying to earthworks and indigenous vegetation clearance in a SNA where the activities are for the operation and development of regionally significant infrastructure, and in particular the National Grid.</p> <p>██████ considers that such a stringent activity status does not give effect to the enabling policies of the National Policy Statement on Electricity Transmission Activities or the approach set out to the management of effects in Policy 16.3.4 of the Canterbury Regional Policy Statement. ██████ considers that discretionary activity status is the most appropriate and efficient way to give effect to the NPSET and CRPS.</p>	
<a href="#">100.23</a>	ECO – Ecosystems and indigenous biodiversity	ECO-R7 Planting of potential pest species	General	<p><i>ECO-R7 refer to comments under ECO-P8. Alternative wording could be Planting of exotic plant species which are prone to wilding spread.</i></p>	
<a href="#">102.5</a>	ECO – Ecosystems and indigenous	General		<p><i>Of all agricultural systems, the pastoral system is the least intensive; and drystock is the least intensive of all pastoral systems. This is partly due to the philosophies which drive drystock farmers, partly due to cost benefit analysis involved with the range of intensiveness of farming systems, and partly due to the land that is used.</i></p>	

	biodiversity		<p><i>Because of these factors, drystock farmers are generally able to make space for other life on their land and integrate indigenous species into their systems. As already mentioned above, the drystock sector holds a greater proportion of indigenous vegetation on drystock land within private ownership than any other sector.</i></p> <p><i>This means that drystock farmers are disproportionately affected by policy pertaining to indigenous biodiversity than any other private land holder or sector.</i></p> <p><i>██████████ understand that the proposed Ecosystem and Indigenous Biodiversity chapter of the dDP is intended to maintain indigenous biological diversity (indigenous biodiversity). ██████████ further understand that a plan change may be required to give effect to the impending National Policy Statement for Indigenous Biodiversity ('NPS IB') in the near future. The dDP constitutes an opportunity to lay the foundations on which to build a policy framework to implement the NPS IB. In this sense, those foundations determine the success or failure of the dDP and people of Timaru District to ensure that future generations can enjoy our indigenous taonga.</i></p> <p><i>The dDP indicates that there will be heavy reliance on Significant Natural Areas (SNAs) to maintain indigenous biodiversity in Timaru District. ██████████ are strongly opposed to this approach. We have annexed our submissions on the proposed NPS IB as Appendix A which sets out our reasons and proposed alternatives; and offer this appendix as part of our feedback on the ECO chapter.</i></p> <p><i>Sheep, beef, and deer farmers have been actively engaged in voluntary development of farm environment plans, which provide a targeted approach to identify and manage environmental risks associated with their specific farms and operations. This approach works proactively and positively with farmers to build their capability and understanding, while incentivising ownership of the solutions. The Essential Freshwater Package released in August 2020 includes the requirement for a Certified Freshwater Farm Plan, the requirements of which are currently being developed with input from. As discussed in Appendix A, ██████████ are actively involved in this space and seek that Timaru District Council explore Farm Environment Plans as the preferred way of managing land uses within SNA's and Ecosystems and Indigenous Biodiversity.</i></p>	
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<a href="#">143.44</a>	ECO – Ecosystems and indigenous biodiversity	General		<p><i>Ecosystems and indigenous biodiversity</i></p> <ul style="list-style-type: none"> <li>· Provides for identification, protection and limited modification of areas of value in terms of indigenous biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>· ██████████ support all provisions in principle.</li> </ul>
<a href="#">43.53</a>	ECO – Ecosystems and indigenous biodiversity	General	General	<p><i>General comment:</i></p> <p>Consider amending the SNA maps to remove any areas of overlap that arose from the two sets of mapping undertaken by ██████████ and Environment Canterbury (in some cases these are mapped as overlapping layers).</p>	
<a href="#">44.4</a>	ECO – Ecosystems and indigenous biodiversity	General	General	<p><i>Can this section permit all activities that are compatible with living system/regenerative principles, regardless of zone? The principles being holism, uniqueness, mutualism, evolutionary, nodal, and developmental. The research is quite clear about how to interact with flora and fauna to enable the health of these, water, and our health as humans. It is very problematic when these activities, which are also required for sustainability and in response to climate change, can't happen or something else artificial is mandated.</i></p>	

<a href="#">48.5</a>	ECO – Ecosystems and indigenous biodiversity	General	General	<p>██████████ are uncomfortable with the Draft District Plan especially - Flood overlay NH-Ri. Then SASM/5 and SASM/23 re significance to Maori. EW-R1, the SNA's and GRUZ-1 all make our operation to restrictive and lack commonsense.</p>		
<a href="#">49.24</a>	ECO – Ecosystems and indigenous biodiversity	General	General	<table border="1"> <tr> <td>Query</td> <td> <p>██████████ understands how the loss of cultural resources (rauemi) negatively affects cultural heritage. ██████████ considers salvage of significant cultural resources when indigenous vegetation is cleared is an option and would seek the view of Runaka to comment on this option.</p> </td> </tr> </table>	Query	<p>██████████ understands how the loss of cultural resources (rauemi) negatively affects cultural heritage. ██████████ considers salvage of significant cultural resources when indigenous vegetation is cleared is an option and would seek the view of Runaka to comment on this option.</p>
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<a href="#">100.17</a>	ECO – Ecosystems and indigenous biodiversity	General	General	<p>██████████ ██████████ acknowledges the importance of biodiversity on private land and the responsibilities of landowners and Council to protect Significant Natural Areas.</p> <p>██████████ ██████████ was actively involved in the development of the draft National Policy Statement on Indigenous Biodiversity, released for submissions in early 2020. National alignment on biodiversity protection is essential to ensure that habitats are identified, prioritised, protected and monitored in an effective and consistent way. We encourage Council to consider this future national framework for biodiversity when developing biodiversity protection within its own district.</p> <p>Significant natural areas, rural character, and productive potential land all inter-connect: their outlook and aims may be looked at through different lenses, yet their bases are rooted in rural land. Our members want to see this tension acknowledged and properly</p>		



				<p><i>balanced in the rules, to ensure there is sufficient protection while permitting rural activities to evolve and contribute to the wider community and economy.</i></p> <p><i>Our primary caution in this area is for Council to not get ahead of the pending National Policy Statement for Indigenous Biodiversity, which is likely due for release at some stage between April and June 2021.</i></p> <p><i>We want Council to stick to facts, science, actual data, and to respond to the situation within the District. Too often we see councils get swept up in rhetoric, or ideology, rather than the reality of their district, and this does not lead to appropriate final plan provisions.</i></p> <p><i>As part of the National Policy Statement for Indigenous Biodiversity requirements, landowners will be likely subject to Significant Natural Area assessments on their properties. This must be undertaken in partnership with landowners, in a spirit of engagement, co-operation, openness and a genuine desire to share information, and to provide education, advice and support to those impacted. Where assessments have already been carried out in the District, serious consideration should be given to the need for any further reassessment. It is our understanding that a very thorough assessment of Significant Natural Areas, and that these were the basis of the approach adopted within the proposed NPS Indigenous Biodiversity. On that basis, there should not be a need to redo what has only recently been completed for the District.</i></p> <p><i>The best outcomes for biodiversity within the District will come from non-regulatory support, incentives, and advice. Landowners want to do the right thing, and often it is a lack of understanding and information as to what it is that they have on their properties, or advice on how to best manage resulting biodiversity.</i></p> <p><i>As over 70% of New Zealand's land is held or managed in private ownership, working with landholders in this co-operative way is vital to maintain and improve indigenous biodiversity.</i></p>	
<a href="#">101.1</a>	ECO – Ecosystems and indigenous	General	General	<p><i>The objectives, policies and rules are generally supported. Council's work in identifying significant natural areas and their descriptions of the identified characteristics and values in each identified SNA will strongly assist in the protection of these areas within the plan's framework.</i></p>	

	s biodiversi ty				
<a href="#">137.1</a>	ECO – Ecosyste ms and indigenou s biodiversi ty	Introducti on	The District contains a diverse range of habitats	<i>I support the introduction and especially the identification of SNAs. The sentence “Many of these are endemic, comprising forests, shrubland, herbfields, tussock grasslands, and lake and river margins” needs adding ‘wetlands, drylands’. The comment “In addition, there are likely to be a range of other areas not yet assessed, but containing significant values” is important and needs to be retained.</i>	Retain
<a href="#">137.2</a>	ECO – Ecosyste ms and indigenou s biodiversi ty	Objectives		<i>Objectives: I support all the objectives. However, I note that indigenous flora and fauna not yet identified e.g. not in a SNA has very little or no protection. This is not satisfactory.</i>	Identify indigenous flora and fauna in each SNA
<a href="#">43.54</a>	ECO – Ecosyste ms and indigenou s biodiversi ty	Objectives	ECO-O2 Maintenance and enhancemen t of indigenou	<i>Retain as proposed or retain the original intent and ensure this objective carries down to inform the policies and rules. As the rules currently stand, there appears to be nothing in place to protect indigenous vegetation that falls outside of specified areas.</i>	
<a href="#">43.52</a>	ECO – Ecosyste ms and indigenou s biodiversi ty	Policies	ECO-P6 Protection for long- tailed bats Pro	<i>Retain as proposed or preserve the original intent.</i>	
<a href="#">137.3</a>	ECO – Ecosyste	Policies	ECO-P7 Protection of	<i>Policies: I support all the policies with the following comments.</i>	P7: Remove the second part of the sentence “unless these

	ms and indigenous biodiversity		significant natural areas		activities can demonstrate that the identified biodiversity values are maintained “. It is very unlikely that identified values can be maintained and is in direct contradiction to the expressed goal of protecting SNAs in ECO-R5 and ECO-R6.
<a href="#">140.3</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P7 Protection of significant natural areas	<p><i>Clearance of indigenous vegetation and earthworks</i></p> <p><i>Draft Policy ECO-P7 and associated draft Rules ECO-R5 and ECO-R6: Clearance of indigenous vegetation and earthworks within a SNA (non-complying activities) is also supported provided it can be agreed what “indigenous vegetation” is defined as and whether certain minimal earthworks within SNA’s can be permitted (e.g. fence posts, earthworks associated with permitted tree removal, maintenance of pathways/ tracks to facilitate access for maintenance). The draft definitions below indicate that earthworks do not include earthworks required for installation of fence posts, gardening or cultivation. Further the definition of indigenous vegetation does not include vegetation that has been planted (must be naturally occurring).</i></p> <p><i>Draft Policy ECO-P7</i></p> <p><i>Protect the identified biodiversity values of SNA’s from clearance of indigenous vegetation and earthworks, unless these activities can demonstrate that the identified biodiversity values are maintained.</i></p> <p><i>Draft Definition: clearance of indigenous vegetation:</i></p> <p><i>means the clearing or removal of ‘indigenous vegetation’ by any means, including grazing, cutting, crushing, cultivation, spraying, irrigation, chemical application, artificial drainage, stop banking, overplanting, over sowing, or burning.</i></p> <p><i>Draft Definition: Indigenous vegetation</i></p>	<p>Check integration with relevant definitions - Does it make sense?</p> <p>██████████ would like to undertake further dialogue with the Council, prior to further development and confirmation of the SNA provisions, to enable delivery of a more appropriate and bespoke management regime for the three SNA’s on his property given their unique and more unusual characteristics as part of what is essentially the property’s large “heritage garden”. He seeks to be a co-operative owner in terms of protection of the qualities and values that make the three areas “significant”, and be given more flexibility in the overall management of each site given the general appreciation that much of the three SNA’s (particularly ██████████</p>

				<p><i>means naturally occurring vegetation containing plant species that are indigenous to the area/site.</i></p> <p><i>Draft Definition: Earthworks</i></p> <p><i>means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.</i></p> <p><i>Given these definitions, [REDACTED] has a reasonable amount of flexibility under the draft Plan to plant non-pest species in the SNA's and remove any unwanted trees (native and exotic) that were originally planted (and hence not indigenous). It is noted that some of this interpretation contradicts advice he has received from council staff recently in respect to the SNA's on his property.</i></p>	<p>have been planted and continue to be planted and maintained, including weed control, as an extended garden to the homestead.</p>
<a href="#">140.4</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P7 Protection of significant natural areas	<p><i>Clearance of indigenous vegetation and earthworks</i></p> <p><i>Draft Policy ECO-P7 and associated draft Rules ECO-R5 and ECO-R6: Clearance of indigenous vegetation and earthworks within a SNA (non-complying activities) is also supported provided it can be agreed what "indigenous vegetation" is defined as and whether certain minimal earthworks within SNA's can be permitted (e.g. fence posts, earthworks associated with permitted tree removal, maintenance of pathways/ tracks to facilitate access for maintenance). The draft definitions below indicate that earthworks do not include earthworks required for installation of fence posts, gardening or cultivation. Further the definition of indigenous vegetation does not include vegetation that has been planted (must be naturally occurring).</i></p>	
<a href="#">137.4</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P8 Avoidance of pest spread risk Avoid		<p>Policies: I support all the policies with the following comments.</p>

<a href="#">140.2</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P8 Avoidance of pest spread risk Avoid	<p><i>Pest Plant Species</i></p> <p><i>Draft Policy ECO-P8 is supported</i></p> <p><i>Draft Policy ECO-P8</i></p> <p><i>"Avoid the planting of species that are a risk for causing pest spread and that could impact on indigenous biodiversity values."</i></p> <p><i>To implement Policy ECO-P8, it is noted that a list of pest species has been identified in draft Rule ECOR7. Planting any of these species is a non-complying activity. This is supported. The chapter summary for Ecosystems and Indigenous biodiversity indicates that the removal of these pest species from the SNA's will be a permitted activity. However, this is not specifically carried over into the rules and greater clarity is required. Removal of pest species is important to the management and maintenance (and potentially enhancement) of SNA's and agreement as to what are pest species is important to that outcome. For example, what is the status of Himalayan Lilies established by the original owner as garden plants – and considered, by some as a garden feature?</i></p>	Asks what happens about the garden pest species (Himalayan Lilies) currently established within SNA?
<a href="#">137.11</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P9 Biodiversity enhancement Encourage	<p><i>NATC P1 to P10: support in general with the following changes.</i></p>	P9: Add the following: Prohibit buildings and structures within HNWB. Limit buildings and structures to settlement areas and ensure that .....
<a href="#">43.57</a>	ECO – Ecosystems and indigenous biodiversity	Policies	ECO-P9 Biodiversity enhancement Encourage	<p><i>Retain as proposed or preserve the original intent.</i></p>	

<a href="#">137.18</a>	ECO – Ecosystems and indigenous biodiversity	Rules		<p><i>Staff note: Submission appears to request an additional new rule because references R8 but there is no such. Issue should be addressed in Natural Character chapter.</i></p>	R8: No new buildings or structures outside of settlements should be allowed in river or wetland margins.
<a href="#">43.55</a>	ECO – Ecosystems and indigenous biodiversity	Rules	<p>ECO-R6 Earthworks in a significant natural area</p>	<p><i>Amend as follows:</i></p> <p><i>Add new NC2</i></p> <p><i>The earthworks activity is not undertaken for the purpose of flood protection works by Canterbury Regional Council, Timaru District Council, or an agent authorised to act on their behalf.</i></p> <p><i>Clarify that this rule excludes earthworks undertaken during flood protection works, which could be addressed by ECO-R2 (as proposed).</i></p>	
<a href="#">99.19</a>	ECO – Ecosystems and indigenous	Rules	<p>ECO-R6 Earthworks in a significant natural area</p>	<p>██████ position is:</p> <p><i>Oppose in part</i></p>	

	biodiversity			<p><i>Comments relating to feedback</i></p> <p><i>Some limited earthworks within a Significant Natural Area might be required in relation to the ongoing maintenance, repair or improvements to the Scheme's infrastructure. Non-complying activity status would not be the most appropriate activity status for such earthworks, particularly when the works could be required at short notice to ensure the infrastructure continues to operate and serve the needs of the Rangitata-Orton community.</i></p> <p><i>Feedback on the provisions</i></p> <p><i>Amend ECO-R4 to the effect of providing a permitted activity rule for limited earthworks in SNAs where such works are associated with the ongoing maintenance, repair or improvements to the [REDACTED] Scheme storage ponds, water races and river intake, and are authorised by an existing resource consent(s) by the Regional Authority.</i></p>	
<a href="#">137.15</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R6 Earthworks in a significant natural area	NATC- R2, R5, R6: supported	Retain
<a href="#">43.56</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<i>Consider whether other species such as gorse, broom, English ivy, hops or alders may be considered pest species that could be cleared as a permitted activity.</i>	
<a href="#">43.138</a>	ECO – Ecosystems and	Rules	ECO-R7 Planting of	[REDACTED]	

indigenous  
biodiversity

potential  
pest species

*I have an additional point for TDC to consider in regard to the draft district plan, relating to ECO-R7 (planting of potential pest species). Apologies for not including this in the earlier submission, but it was only raised this morning by our biosecurity staff.*

*The list of pest species identified does not completely align with the Canterbury Regional Pest Management Plan. It might be worth considering whether it's possible to align the species in this rule with the pest species identified in the CRPMP. Alternatively, I have been advised that wilding conifers are of particular concern. As per the CRPMP, the following species are pest agents when they are capable of helping the spread of wilding conifers and is not otherwise specified as a pest in the CRPMP and is not located within a plantation forest.*

*Please let me know if you have any questions or would like to discuss this further.*

*Kind regards,*

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**Table 3: Introduced conifer trees**

Common name	Scientific name
Bishops pine	<i>Pinus muricata</i>
Contorta (lodgepole) pine	<i>Pinus contorta</i>
Corsican pine	<i>Pinus nigra</i>
Douglas fir	<i>Pseudotsuga menziesii</i>
Larch	<i>Larix decidua</i>
Maritime pine	<i>Pinus pinaster</i>
Mountain pine and dwarf mountain pine	<i>Pinus mugo and P. uncinata</i>
Ponderosa pine	<i>Pinus ponderosa</i>
Radiata pine	<i>Pinus radiata</i>
Scots pine	<i>Pinus sylvestris</i>



<a href="#">70.10</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<i>NC1 - all the species listed are supported including sycamore and ash. Others, such as rowan, Chilean flame creeper, male fern and moth plant should also be considered for inclusion as well. And such a list should also align with the Regional Pest Management Plan, for pest plants, as well.</i>	
<a href="#">101.4</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<p><i>Planting of potential pest plant species.</i></p> <p><i>The general thrust of Rule ECO-R7 is strongly supported. The breadth of the rules to cover any type of planting is also supported as wildings or plants can escape from pasture amenity and shelter belt plantings.</i></p> <p><i>However, Council should consider including a prohibited activity rule for the following plant species:</i></p> <p><i>1. For planting of some species throughout Timaru District as;</i></p> <ul style="list-style-type: none"> <li><i>· They are unwanted organisms. <a href="https://www.mpi.govt.nz/biosecurity/search-for-a-pest-or-disease/">https://www.mpi.govt.nz/biosecurity/search-for-a-pest-or-disease/</a>Examples include crack and grey willows, Lodgepole pine, Darwin’s barberry and Cotoneaster. Cotoneaster species are often excellent invaders of indigenous shrublands and forest steep lands; <a href="https://www.nzpcn.org.nz/flora/species/?scientific_name=Cotoneaster;">https://www.nzpcn.org.nz/flora/species/?scientific_name=Cotoneaster</a>; Heather Calluna vulgaris<a href="https://www.nzpcn.org.nz/flora/species/calluna-vulgaris/">https://www.nzpcn.org.nz/flora/species/calluna-vulgaris/</a> excluding double flower cultivars.</i></li> <li><i>· For planting of certain tree species in areas above 300m. amsl. These include organisms declared as pests under the Canterbury Regional Pest Management Strategy 2018-2038. <a href="https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-regional-pest-management-plan/">https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-regional-pest-management-plan/</a>. Species identified include larch. All larch species Larix spp. should be identified as larch are a plant of montane and subalpine habitats and sites of low fertility (Timmins &amp; Mackenzie 1995). A plant of</i></li> </ul>	

				<p>Tussocklands (Timmins &amp; Mackenzie 1995). <a href="https://www.nzpcn.org.nz/flora/species/?scientific_name=Larix">https://www.nzpcn.org.nz/flora/species/?scientific_name=Larix</a></p> <ul style="list-style-type: none"> <li>· Other species that should be prohibited from planting above 300m amsl include Mountain (both species), Bishop, Corsican and Scots pines. (See also Rules NFL-R5 and NFL-R8)</li> </ul> <p>2. Other species should be added to the list in NC-1. These species include:</p> <ul style="list-style-type: none"> <li>· Birch species. Amongst the <i>Betula</i> spp. is <i>Betula pendula</i> (Silver birch) a significant invasive species in both Southland and McKenzie Basin. it is also known for its health allergies and asthma because of its pollen;</li> <li>· Red flowering currant (<i>Ribes sanguineum</i>); <a href="https://www.nzpcn.org.nz/flora/species/ribes-sanguineum/">https://www.nzpcn.org.nz/flora/species/ribes-sanguineum/</a>;</li> <li>· White poplar (<i>Populus alba</i>) which spreads and suckers profusely; <a href="https://www.nzpcn.org.nz/flora/species/populus-alba/">https://www.nzpcn.org.nz/flora/species/populus-alba/</a></li> </ul>	
<a href="#">101.5</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<p>NC2 Planting of potential pest species above 300m amsl</p> <p><i>The inclusion of Douglas fir in this list is strongly supported as this species has very light seeds which will colonise the hill and high country of Timaru District. Control of seedlings using livestock will require heavy grazing which has the potential to intensify the loss of indigenous vegetation values and accelerate erosion of the land. It is noted that the National Environment Standard (Plantation Forestry) Regulations 2017 may allow the planting of plantation tree species in areas of indigenous vegetation. An example could be Douglas fir in a tussock grassland.</i></p>	
<a href="#">101.6</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<p>Russell lupins</p> <p><b>██████████</b> strongly supports a non-complying activity status for planting of Russell lupin above 300m amsl. as this lupin will invade braided riverbeds including the Opihi and Rangitata and their tributaries with loss of the significant braided river bird habitat. The spread of lupin will reduce the nesting and roosting habitat on the gravel bars.</p>	

				<p><i>The escape of Russell lupins to, for example, the upper Rangitata River above the Rangitata gorge will also have significant adverse effects on these rivers outstanding natural feature and natural landscape values that have been identified in the Water Conservation (Rangitata River)</i></p> <p><i>Order 2006. <a href="http://legislation.govt.nz/regulation/public/2006/0401/latest/whole.html#DLM6667913">http://legislation.govt.nz/regulation/public/2006/0401/latest/whole.html#DLM6667913</a></i></p> <p><i>These values include their braided river characteristics of bare gravel bars with multiple channels and its outstanding wild and scenic values of remoteness and isolation and ruggedness. A braided riverbed with areas of flowering lupins is incongruous in this outstanding natural feature and natural landscape.</i></p>	
<a href="#">138.1</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R7 Planting of potential pest species	<p><i>I wish to comment on Part 2 Section ECO-R7: Planting of potential pest species. A list of 'non complying' species is given, meaning consent is necessary before planting? I believe the planting many species on this should be list NOT PERMITTED under any circumstance eg Old Man's Beard! I feel it would be much more appropriate for Council to refer to the Regional Pest Management Strategy when consenting the planting of such species, rather than the proposed list. This Strategy is informed and continually updated (eg: considers new pest species). Thank you for your consideration of this.</i></p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<a href="#">79.3</a>	ECO – Ecosystems and indigenous biodiversity	Rules	All zones Activity status: Non-complying Where: NC-1 The planting involves any of the following species: Acer pseudoplatanus (sycamore)	<p><i>In ECO - R7 the planting of potential pest species - the NC1 and NC2 lists need to correspond with the Canterbury Regional Pest Management Plan. The lists appear to be confused. In NC1 some species including olds mans beard and banan passionfruit have been declared as pests in the CRPMP and so should be prohibited from being planted anywhere.</i></p> <p><i>Russell Lupins are a threat to indigenous habitat and while the CRPMP unhelpfully distinguishes between russell lupin and wild russell lupin (wild russell lupin are russell lupin that are established by natural means are declared a pest while russell lupin are a pest agent CRPMP p21), we recommend that russell lupin be considered a pest regardless of whether it is wild or not.</i></p>	

				<p><i>Tree lupin is considered an organism of interest. We recommend that planting of tree or russell lupin be strongly discouraged. Prohibiting the planting of lupins is especially important in the high country and on any land adjacent to river beds.</i></p> <p><i>Many of the other species listed in NC1 are considered organisms of interest in the CRPMP and could easily become pests so should be strongly discouraged from being planted.</i></p> <p><i>Many of the tree species listed in NC2 including Larix decidua, Pinus contorta, P. mugo, P. corsican, P. muricata, P. nigra &amp; Psuedotsuga menziesii are declared pests in the CRPMP and most of the others are listed as organisms of interest Planting of these species should be strongly discouraged if not prohibited.</i></p> <p><i>Reccomendation: Please redraft the NC1 and NC2 consistent with the Canterbury Regional Pest Management Plan and take a stronger stance than the CRPMP on russel and tree lupins especially in the high country and for land adjacent to braided rivers and their tributaries.</i></p>			
<a href="#">43.58</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for f	<p><i>Amend as follows:</i></p> <table border="1"> <tr> <td>ECO-R2</td> <td><b>Earthworks and cClearance of indigenous vegetation for flood protection works, except where listed as a permitted activity</b></td> </tr> </table>	ECO-R2	<b>Earthworks and cClearance of indigenous vegetation for flood protection works, except where listed as a permitted activity</b>	
ECO-R2	<b>Earthworks and cClearance of indigenous vegetation for flood protection works, except where listed as a permitted activity</b>						
<a href="#">43.59</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R2 Clearance of indigenous vegetation for f	<p><i>CON-1</i></p> <p><i>The earthworks or vegetation is located within an area covered by rule ECO-R3 or ECO-R5 and CON-2</i></p> <p><i>CON-2</i></p> <p><i>The earthworks or vegetation clearance is carried out solely for the purpose of flood protection works; and</i></p>			

				<p><i>CON-3</i></p> <p><i>The earthworks or vegetation clearance is carried out by the Regional Council, Timaru District Council, or an agent authorized by one of these parties.</i></p> <p><i>Without this amendment, earthworks associated with flood protection works are a non-complying activity in accordance with ECO-R6 rather than controlled, as other similar activities are.</i></p>	
<a href="#">137.5</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation	<p><i>Rules: I support the rules in general, but some need changes or additions.</i></p>	<p>“The vegetation is not located within a SNA (identified in <a href="#">SCHED8 - Schedule of Significant Natural Areas</a> and on the Planning Maps), is not subject to ECO-R3 and lies in improved pasture.</p>
<a href="#">99.18</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation	<p>█████ <i>position is:</i></p> <p><i>Support in full</i></p> <p><i>Comments relating to feedback</i></p> <p>█████ <i>supports the ability to clear indigenous vegetation for the purposes of maintaining, repairing or replacing existing lawfully established activities as listed in RCO-R1.</i></p> <p><i>Feedback on the provisions</i></p> <p><i>Retain ECO-R1 as drafted.</i></p>	

<a href="#">129.9</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R1 Clearance of indigenous vegetation	<p><i>Rules ECO-R1 (PER-4) and ECO-R3 – These rules control general indigenous vegetation clearance (PER-4) and indigenous vegetation clearance in specific identified areas (ECO-R3). Both rules are overly-restrictive and fail to provide for general vegetation clearance necessary for such things as safety, access to areas and structures, and maintenance of amenity. For example, indigenous vegetation clearance for intersection sight-lines is not strictly for repair or maintenance of a road, but rather a road safety intervention; this would be captured by rule ECO-R3. Vegetation clearance to gain access to a bridge structure that is not in imminent danger would not comply with PER-2 and, if not pohuehue, would require resource consent. Vegetation shading roads and causing winter icing, or at risk of wind-throw, or that is damaged by storm events (for example, snow collapse) may also be inadvertently captured by these rules.</i></p>	Relief sought – make these rules less restrictive to provide for the general need to clear, or prune indigenous vegetation for a broader range of reasons. An alternative approach may be to allow for the clearance of an area up to (for example) 100m <sup>2</sup> per 12 month period as a Permitted Act
<a href="#">101.2</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p><i>RDIS-5 Vegetation located at an altitude of 900m or higher.</i></p> <p><i>There are concerns about Rule ECO-R3 Matters for discretion as the triggers for Council involvement on the matter of clearance of indigenous vegetation that are in areas not identified as a significant natural area. Council has a function to maintain indigenous biodiversity generally under s31(1) (b) (iii) RMA. Council also has the function of avoidance or mitigation of natural hazards under s31(b)(i) RMA. Rule RDIS 5 involves the clearance of indigenous vegetation located at an altitude of 900m or greater. Between 800m and 900m there are areas of subalpine shrubland<sup>[1]</sup> indicating that clearance of indigenous vegetation for, for example, pastoral farming or forestry is probably inappropriate. It is therefore suggested that the altitude be reduced to 800m amsl or higher.</i></p> <p><i><sup>[1]</sup> Landcare database LCDB4v1</i></p>	
<a href="#">101.3</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p><i>RDIS 6 manages the clearance of indigenous vegetation on land with an average slope 30 degrees or higher. 30 degrees is a steep slope. Such an approach may not maintain indigenous biodiversity or manage the significant risk from natural hazards. The ranges of Timaru District already have significant, probably natural, erosion with extensive scree slopes. With an increase in land use intensity including clearance of indigenous vegetation, it is more than likely there will be an acceleration of erosion during storm events.</i></p>	

				<p><i>Lands potentially affected by these rules include parts of Mule Spur and Four Peaks, Ben McLeod and Tara Haa Ranges. Examining the satellite photography and the Land Cover Database (LCDBv1 (2015), for example on slopes of Tara Haa Range, there are significant areas between 700 m and 900m of tall tussock grasslands. There are also significant areas of landslides and other erosional features. Removal of indigenous vegetation could activate slumps and accelerate erosion of scree with gravel being deposited on the lowland flats including wetlands. Some of the streams and their margins and wetlands near Mt Peel are feeding areas of Long tailed bats (nationally critical). Access could also be affected on parts of the Rangitata Gorge Road which provides access to public conservation land including part of Te Kahui Kaupeka Conservation Park. Council could consider including a matter for discretion, the effects of removal of indigenous vegetation on the potential to increase the risk of natural hazards with a link to the Natural Hazards Chapter Policy NH-P3.</i></p>	
<a href="#">102.6</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p>██████████ strongly support ECO R3 all zones exemption (6), which allows for the clearance of indigenous vegetation where it is within an area of improved pasture. Our interpretation of this provision gives a permitted activity pathway for clearance of indigenous vegetation that would otherwise require a consent for a restricted discretionary resource consent under ECO R3. We request that this exemption is retained as it gives substantive recognition and support for existing uses, as well as protecting productive land for productive use.</p>	
<a href="#">137.17</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p>██████████ R2, R5, R6: supported - Edit R3</p>	<p>R3: PER-2 and PER-3 need to be deleted. They would be in contradiction to other rules</p>
<a href="#">137.6</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p><i>Rules: I support the rules in general, but some need changes or additions.</i></p>	<p>ECO-R3 RDIS-1: Fully supported</p> <p>ECO-R3 RDIS-2 – 4: The wording “within 20m of” needs to be changed to “within 50m of” to be in line with PER1. There is no reason why the</p>

					<p>distance should be less and it would be very confusing as well.</p> <p>ECO-R3 RDIS-5: The sentence “The vegetation is located at an altitude of 900m or higher” should be changed to “500m or higher”. There is no scientific reason for the proposed altitude. There is a notable change of vegetation around the altitude of 500 to 600m. Around this altitude vegetation in the hill country generally changes to tussock land.. Just because the proposed number was in the old District Plan, is not a good reason to keep this.</p> <p>ECO-R3 RDIS-6: supported</p> <p>Matters of discretion: Under 9. the second part of the sentence “and the resources available to undertake mitigation” should be deleted. If the landholder does not have the resources for mitigation, then the activity should not be undertaken.</p> <p>ECO-R4 to R7: all supported in general. Changes or additions suggested for R7-NC1: add <i>Sorbus aucuparia</i> (Rowan);</p>
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					include all Berberis and Cotoneaster species.
<a href="#">79.1</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation within specified areas	<p><i>This feedback relates to ECO-R3 Clause 6 exemption, as it relates to the definition of improved pasture.</i></p> <p><i>We support continuing existing land use activities inside and outside of SNAs as drafted, however the proposed improved pasture definition is ambiguous and may result in the loss of indigenous vegetation and habitat. If the definition could be changed to that we have suggested in the definitions section and the council then maintain a map of existing improved pasture (at a point in time - suggested at the time the plan was written), then policy ECO-02 The indigenous biodiversity of the district will be maintained or enhanced, will more likely be achieved.</i></p> <p><i>We are concerned that hill country under 30degrees that has been modified through top dressing and oversowing but retains a cover of native vegetation which is vital habitat for native species such as lizards, invertebrate and birds, maybe considered improved pasture and therefore exempted by clause 6.</i></p> <p><i>We also suggest that adopting a process to as set out in the National Policy Statement for Indigenous Biodiversity 3.12 Existing activities in SNAs and 3.13 General rules applying outside SNAs, would be useful.</i></p>	
<a href="#">91.15</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R3 Clearance of indigenous vegetation withi	<p>1. ■■■ considers indigenous vegetation clearance for the installation, operation and maintenance of irrigation infrastructure should be included as an exemption from this rule. ■■■ notes that a Regional Council consent for installation of new irrigation infrastructure would consider any actual or potential adverse effects on significant indigenous biodiversity.</p>	
<a href="#">129.10</a>	ECO – Ecosystems and	Rules	ECO-R3 Clearance of indigenous	<p><i>Rules ECO-R1 (PER-4) and ECO-R3 – These rules control general indigenous vegetation clearance (PER-4) and indigenous vegetation clearance in specific identified areas (ECO-R3). Both rules are overly-restrictive and fail to provide for general vegetation clearance</i></p>	Relief sought – make these rules less restrictive to provide for the general need to clear, or

	indigenous biodiversity		vegetation withi	<i>necessary for such things as safety, access to areas and structures, and maintenance of amenity. For example, indigenous vegetation clearance for intersection sight-lines is not strictly for repair or maintenance of a road, but rather a road safety intervention; this would be captured by rule ECO-R3. Vegetation clearance to gain access to a bridge structure that is not in imminent danger would not comply with PER-2 and, if not pohuehue, would require resource consent. Vegetation shading roads and causing winter icing, or at risk of wind-throw, or that is damaged by storm events (for example, snow collapse) may also be inadvertently captured by these rules.</i>	prune indigenous vegetation for a broader range of reasons. An alternative approach may be to allow for the clearance of an area up to (for example) 100m <sup>2</sup> per 12 month period as a Permitted Activity.
<a href="#">79.2</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R4 Clearance of trees in the long-tailed ba	<p><i>Matters of Discretion, please add:</i></p> <p><i>1. whether, upon specialist assessment by a suitably qualified ecologist or by the Department of Conservation (which may only be carried out during October to April when bats are hibernating) if in their opinion the tree is possible long tailed bat roosting habitat, the trees proposed to be removed, is habitat for long tailed bat.</i></p> <p><i>We are concerned the timing proposed in the matters of discretion (October to April) may be overly restrictive. An assessment to confirm that a tree is NOT habitat for long tailed bats could be done anytime of year, but where there is uncreinty, further assessment should take place during the summer months when long tailed bats are active and before the removal of any trees in the long tailed bat protection area that could provide habitat.</i></p>	
<a href="#">146.1</a>	ECO – Ecosystems and indigenous biodiversity	Rules	ECO-R4 Clearance of trees in the long-tailed ba	<p><i>In general I am pretty happy with what is proposed but have made a couple of minor amendments to the assessment criteria. The first is to add DOC in as a party who can assess trees and the second it to slightly amend assessment timeframes. My thinking here is that if a suitably qualified person went to assess a tree and in their opinion there was absolutely no chance of it being a roost tree (straight no holes etc) then that can be made at any time of year. If they went, had a look then decided that it may provided habitat then they would need to carry out a further assessment when the bats are active in summer.</i></p>	<p>Activity status: Restricted Discretionary</p> <p>Where: RDIS-1</p> <p>The removal of any tree within the long-tailed bat protection area shown on the Planning Maps, that is:</p> <p>1. a native tree with a trunk circumference at 1.5m</p>

					<p>above ground level greater than 31.5cm; or</p> <p>2. an exotic tree, excluding willow, with a trunk circumference at 1.5m above ground level greater than 70cm; or</p> <p>3. any willow tree with a trunk circumference at 1.5m above ground level greater than 120cm.</p> <p>Except</p> <p>The following activities are exempt from this rule:</p> <p>1. removal of trees planted for timber production (plantation forest and woodlots) or trees planted within domestic gardens.</p> <p>Matters of discretion are restricted to:</p> <p>1. whether, upon specialist assessment by a suitably qualified ecologist or the Department of Conservation (which may only be carried out during October to April when bats are not</p>
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					<p>hibernating if their opinion the tree is possible roosting habitat), the tree/s proposed to be removed is habitat for long-tailed bats; and</p> <p>2. the extent to which the removal of tree/s would impact on the ability of the long-tailed bat protection area to provide for the habitat needs of the bats; and</p> <p>3. the extent to which the long-tailed bat protection area has been previously modified by the removal of bat habitat.</p>
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