

**BEFORE THE INDEPENDENT HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND** the proposed Timaru District Plan

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**Evidence of Richard Ian Clayton**  
**on behalf of the Director-General of Conservation *Tumuaki Ahurei***  
**Hearing B: Rural Zones**  
**Submitter No. 166 Further Submitter No.166**  
**Dated: 8<sup>th</sup> July 2024**

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## **Executive Summary of Key Points**

1. The Peel Forest Park Scenic Reserve is of very high ecological significance, both regionally and nationally. It represents one of the last remaining podocarp forests in Canterbury and provides important habitat for threatened and at-risk species.
2. The area of Blandswood is bounded on all sides by the Peel Forest Park Scenic Reserve. Blandswood acts as an important ecological link to the habitat within and surrounding the Peel Forest Park Scenic Reserve.
3. Apart from direct clearing of vegetation around dwellings, land in Blandswood is dominated by late successional forest, mostly old (c. 100+ years) kānuka forest and secondary hardwoods, but with occasional emergent large podocarp trees. The understorey is very diverse and provides an important ecotone/transition between the mosaic of forest types.

## Introduction

1. My full name is Richard Ian Clayton
2. I have been asked by the Director-General of Conservation *Tumuaki Ahurei* ('the D-G') to provide expert evidence on the proposed Timaru District Plan.
3. This evidence relates to Hearing B which includes Rural Zone provisions.

## Qualifications and experience

4. I am employed by the Department of Conservation (DOC) as an Ecologist. I have worked for DOC since 2018. In my role I provide technical and scientific advice to DOC's work managing threatened plant species and ecosystems in the Eastern South Island.
5. I have previously been employed by Manaaki Whenua Landcare Research as a researcher in animal pest ecology and plant conservation for five years. I have also worked as a contractor and ecological consultant for both regional and central government organisations.
6. I have experience in planning conservation management and reporting on the significance of ecological values using standard significance criteria, such as those outlined in the Canterbury Regional Policy Statement.
7. My qualifications are MSc Ecology (with distinction) obtained at Otago University in 2004. My thesis was on the impacts of introduced rats on the island flora of Rakiura/Stewart Island.
8. I have previously provided evidence on regional pest management plans on behalf of DOC. I am currently providing ecological advice and comments as part of preliminary input to the district plans for Waimakariri, Selwyn and Waitaki District Councils.
9. I am a committee member of the New Zealand Plant Conservation Network, representing DOC on this forum.

10. I am also a part of the group of experts inside DOC who manage threatened plant species funds, management and priorities - the equivalent of a threatened taxa advisory group.
11. I have written or contributed to numerous peer-reviewed publications on plant ecology and wider conservation efforts in New Zealand (see Appendix 3 in my statement dated 22<sup>nd</sup> April 2024).

### **Code of Conduct**

12. Although this is a Council hearing, I have read the code of conduct for expert witnesses as contained in the Environment Court's Practice Note 2023 (the Code). I have complied with the Code when preparing my written statement of evidence.
13. The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.
14. Unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
15. For the avoidance of doubt, in providing this evidence as an expert witness in accordance with the Environment Court Code of Conduct, I acknowledge that I have an overriding duty to impartially assist the Panel on matters within my area of expertise. The views expressed are my own expert views, and I do not speak on the D-G's behalf.

### **Scope**

16. I have been asked to provide evidence in relation to the notified proposed Timaru District Plan, the D-G's submission (submitter number 166), and the D-G's further submission.
17. My evidence addresses the following matters:
  - a. A brief overview of the ecological significance of the Peel Forest Park Scenic Reserve and the major ecosystem types present and their status.

- b. The general ecological importance of the surrounding area of Blandswood, and its role as an ecological link for the Peel Forest Park Scenic Reserve.
- c. These comments are general and introductory, pending an updated ecological assessment of the area, and further, detailed evidence is intended to be provided in later hearings.

### **Material Considered**

- 18. In preparing my evidence I have read and relied upon the following documents:
  - a. The Proposed Timaru District Plan 2022.
  - b. The D-G's submission dated 15 December 2022 and further submissions dated 4th August 2023.
  - c. The s42A Report dated 19 June 2024.
- 19. I have visited the Peel Forest Park Scenic Reserve and Blandswood on numerous occasions and previously conducted many ecological assessments in the wider area. I have also consulted relevant ecological literature about the area. However, I have not undertaken a site visit or ecological survey for the purposes of this hearing. The contents of this statement will be supplemented with additional evidence at later hearings and should be read with these points in mind.

### **The Ecological Significance of Peel Forest**

- 20. The Peel Forest Park Scenic Reserve (hereafter "Peel Forest") is approximately 4,100 ha, located approximately 20 km north of Geraldine and is situated entirely within the Orari Ecological District.<sup>1</sup> This Ecological District (of c.112,500 ha) is characterised by the foothills and low peaks between the agricultural landscape of the Canterbury Plains and higher ranges inland towards the Southern Alps.

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<sup>1</sup> McEwen, W. M. 1987. Ecological Regions and districts of New Zealand (3<sup>rd</sup> revised edition), Sheets 3 and 4. NZ Biological Resources Centre Publication No. 5. Department of Conservation, Wellington.

21. Most of the Ecological District is Crown Land administered by LINZ, in the form of Crown Pastoral Leases. Protected Conservation Land (PCL) makes up approximately 11% of the Ecological District, with almost half of this being the reserve located around Peel Forest.
22. There has been wholesale clearance of forest from surrounding areas, both on the plains and in the surrounding foothills. More than 90 % of the Orari Ecological District was once covered in forest<sup>2</sup> – dominated by either mountain beech and mountain totara, or occasionally podocarp-hardwood forest types. Today, this has been reduced to approximately 2% cover. Removal of many of the larger podocarp trees from the hillslopes was also occurring as late as the early 1900s, but since that time, in contrast to the continued forest clearance and logging of surrounding lands, Peel Forest was left reasonably intact and left to regenerate.
23. The enormous lowland remnant trees at the south of the Peel Forest reserve are some of the last and best remaining examples of what would have been a more widespread forest across this part of the Canterbury landscape in pre-European times, and indeed further out into the Canterbury Plains during pre-human times.
24. The presence of podocarp trees themselves confers additional ecological importance, given that so much previous and remnant forest in Canterbury today is dominated by mountain beech, a much more common and far less biodiverse vegetation type in the Eastern South Island.
25. Peel Forest contains one of the largest remaining stands of original podocarp forest in lowland Eastern South Island. As such, it has regional, and national ecological significance for this reason alone.
26. Further, using the standard criteria for accessing ecological significance provided by the National Policy Statement for Indigenous Biodiversity (NPSIB) and the Canterbury Regional Policy Statement (CRPS), the site scores very highly for all of the following criteria<sup>3</sup>:

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<sup>2</sup> Harding, M. 2009. Canterbury Land Protection Strategy. Nature Heritage Fund, Wellington. 132pp.

<sup>3</sup> The following estimates are a summarised form of the categories outlined in the CRPS and NPSIB

27. **Representativeness:** Peel Forest is the best remaining example of this forest type in the Ecological District (and probably the whole Ecological Region).
28. **Ecological Integrity/ Naturalness:** Mostly intact, almost entirely native flora with very little fragmentation and 'normal' levels of pressure from introduced mammals, herbivores etc.
29. **Diversity and Pattern:** Very high diversity in both physical attributes, i.e. geology, altitude, aspect, topography etc.; and in biological attributes: very large gradients in communities and ecosystems and a large array of vegetation types providing habitat for a very diverse fauna, from lowland to sub-alpine.
30. **Rarity and Distinctiveness.** The very diverse flora and fauna associated with the Peel Forest includes notable species, for example:
  - a. The Mt Peel Edelweiss (*Leucogenes tarahaoa*; Threatened: Nationally Vulnerable). Only found at this location.
  - b. A large range of forest birds, including Kārearea - Eastern New Zealand Falcon (Threatened: Nationally Vulnerable).
31. **Ecological Context:** The site is very large, compact (i.e. low boundary to area ratio), continuous and provides one of the important central links to the many other biodiversity remnants in the landscape. This includes other Crown land administered as Pastoral Leases and the many biodiversity remnants on private land.

### **Blandswood and the Ecological Link Surrounding Peel Forest**

32. The private land settlement of Blandswood is approximately 10 ha, and the collection of c 50 dwellings there are bounded on all sides by the Peel Forest Reserve and/or road reserve.
33. Vegetation has been cleared directly around dwellings however the remainder of land is dominated by late successional forest, mostly old (c. 100+ years) kānuka forest and secondary hardwoods, but with occasional emergent large podocarp trees. The understorey is very diverse and provides an important ecotone/transition between the mosaic of forest types mentioned above.



34. Overall, the forested area is ecologically important for several reasons:
- a. It acts as habitat for a very high diversity of flora and fauna, including communities that are rare in other parts of the ED;
  - b. It functions as a critical, almost continuous ecological link between the surrounding parts of the Peel Forest, being the forested slopes and the magnificent ancient trees on the toe slopes;
  - c. Based on desktop assessment, the Blandswood area would score highly for at least three of the five ecological significance criteria: Representativeness, Naturalness, Diversity / Pattern and likely scores highly in each of the other criteria (noting that my preliminary view requires confirmation with an up-to-date site assessment).

## Conclusion

35. The Peel Forest Park Scenic Reserve is of very high ecological significance, both regionally and nationally. It represents the best example of the last remaining podocarp forests in Canterbury and provides important habitat for threatened and at-risk species. The area of Blandswood is bounded on all sides by the Peel Forest Reserve and is also ecologically significant, acting as an important ecological link to the habitat within and surrounding the Peel Forest Reserve.



Richard Clayton

DATED 8<sup>th</sup> July 2024

