

**BEFORE THE INDEPENDENT HEARING PANEL**

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

**AND**

**IN THE MATTER**                    a submission and further submission on the proposed  
Waimakariri District Plan

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**Evidence of Elizabeth Moya Williams**  
**on behalf of the Director-General of Conservation *Tumuaki Ahurei***  
**Hearing Stream 7A: Ecosystems and Indigenous Biodiversity**  
**Submitter No. 419 Further Submitter No.77**  
**Dated: 2 September 2024**

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**Department of Conservation | *Te Papa Atawhai***  
Private Bag 4715  
Christchurch Mail Centre  
Christchurch 8140  
Solicitor rōia: Pene Williams  
Phone waea: 027 408 3324  
Email Īmera: [pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)

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## Table of Contents

EXECUTIVE SUMMARY OF KEY POINTS.....	3
INTRODUCTION.....	4
CODE OF CONDUCT .....	5
SCOPE .....	6
MATERIAL CONSIDERED.....	6
THE 'UNMAPPED' SNA APPROACH IN THE PROPOSED PLAN.....	7
IMPROVED PASTURE APPROACH.....	8
IRRIGATION INFRASTRUCTURE SETBACK FROM A SNA – ECO-P2(3) AND ECO-R4 ..	10
PROPOSED CHANGES TO MAPPED SNA SITE BOUNDARIES .....	11
APPENDIX 1 TABLE OF SUBMISSION POINTS AND RECOMMENDATIONS.....	14

### **Executive Summary of Key Points**

1. Overall, I am generally supportive of the amendments proposed in the Council Officer's Section 42A report on the proposed Waimakariri District Plan ECO chapter.
2. My evidence recommends amendments to ECO-R2 (indigenous vegetation clearance outside of SNAs) to clarify the relevant rule that applies if a SNA is identified through the ecological significance criteria set out in the proposed plan in ECO-APP1.
3. I consider that changes are required to the policy and rule (ECO-P2 and ECO-R4) relating to irrigation infrastructure setback from SNAs so that the setback does apply to wetland SNAs given the uncertainties around the 'beneficial' effects of irrigation infrastructure on wetlands.
4. Based on the evidence provided by ecologist, Richard Clayton, I recommend that the SNAs 034, 051, & 048 listed in ECO-SCHED1 and shown on the planning maps, are retained as notified.

## Introduction

1. My full name is Elizabeth (Liz) Moya Williams (*née* Lightbourne).
2. I have been asked by the Director-General of Conservation *Tumuaki Ahurei* (Director-General, D-G) to provide expert evidence on the proposed Waimakariri District Plan (the proposed plan).
3. This evidence relates to Hearing 7A which includes Ecosystems and Indigenous Biodiversity.

## Qualifications and experience

4. I am employed by the Department of Conservation (DOC) in Dunedin as a Resource Management Planner. I have worked for DOC in this role since June 2022.
5. Prior to this I have over sixteen years of experience in resource management, including roles in both consenting and plan development. This includes four years as a planner at the Environment Agency (a national public body in England and Wales), a combined total of eleven years as a Consents Officer at Christchurch City Council, Campbell River City Council (Canada) and Tasman District Council, and more recently two years as a Policy Planner at Dunedin City Council.
6. My experience relevant to the current process includes:
  - a. Eleven years' experience processing the full range of resource consents for unitary and district council's, including as reporting officer for non-notified and notified applications and attendance at Council Hearings.
  - b. Providing input from a national perspective on proposed plans.
  - c. Writing section 42A report on a plan variation and involvement in plan appeals and Environment Court mediation.
  - d. In my role with DOC, providing expert planning evidence on proposed Plan Change 18 Cromwell Industrial Expansion (setback from a Reserve which contained significant indigenous biodiversity values), the proposed Timaru

District Plan and proposed Gore District Plan (submissions on the ECO chapter of these plans).

- e. I hold a Bachelor of Resource and Environmental Planning with Honours from Massey University (May 2003).
7. I am an Intermediate Member of the New Zealand Planning Institute.

### **Code of Conduct**

8. I confirm that I have read the code of conduct for expert witnesses (Code) as contained in the Environment Court Practice Note 2023. I have complied with the Practice Note and Code when preparing my written statement of evidence and I will do so when I give oral evidence at the hearing.
9. For the avoidance of doubt, in providing this evidence as an expert witness in accordance with the Code, I acknowledge that I have an overriding duty to impartially assist the Panel on matters within my area of expertise. The views and opinions expressed are my own expert views and opinions, and I do not speak on behalf of the Director-General.
10. 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 views and opinions expressed are also set out in the evidence to follow. This includes where relevant:
  - a. Why other alternative interpretations of data are not supported;
  - b. Any qualification if my evidence may be incomplete or inaccurate without such qualification;
  - c. Any knowledge gaps and the potential implications of the knowledge gap;
  - d. If my opinion is not firm or concluded because of insufficient research or data or for any other reason;
  - e. An assessment of the level of confidence and the likelihood of any outcomes specified in my conclusion(s).

11. 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.

### **Scope**

12. I have been asked to provide evidence on the Ecosystems and Indigenous Biodiversity topic for the proposed Waimakariri District Plan.
13. My evidence addresses the following matters:
- the 'unmapped' SNA approach in the proposed Plan;
  - improved pasture approach in the proposed Plan;
  - irrigation infrastructure near SNAs; and
  - SNA boundary amendments.
14. Where there are elements of the D-G's submission that I do not address in my evidence, I generally agree with the approach and recommendations set out in the Section 42a Officers report. I therefore will not comment on those points unless there is a matter of clarification required. To clarify, I have included a table in Appendix 1 to summarise the D-Gs submission points and recommendations made in this evidence based on the s42a Officers report.

### **Material Considered**

15. In preparing my evidence I have read and relied upon the following documents:
- a. The s32 Evaluation Reports:
    - (i) 1. Overview s32 Report
    - (ii) 11. Ecosystems and Biodiversity s32 Report
  - b. The D-G's submission dated 26 November 2021
  - c. The D-G's further submission dated 21 November 2022
  - d. The s42A Officer's Report: Pūnaha hauropi me te rerenga rauropi taketake – Ecosystems and Indigenous Biodiversity Chapter, dated 16 August 2024

## The 'unmapped' SNA approach in the Proposed Plan

16. The proposed plan contained references within the policies and rules to 'mapped' and 'unmapped' SNAs. The D-G's submission<sup>1</sup> sought that all SNAs should be treated equally as they are all considered significant regardless of whether or not they are mapped. The relief sought by the D-G requested that the terms 'mapped' and 'unmapped' be removed.
17. Section 3.8 of the Council Officer's s42A report sets out the new approach for unmapped SNAs. It is proposed to define a SNA as any listed in ECO-SCHED1 and *any other area that meets one or more of the ecological significance criteria* as listed in ECO-APP1. All references to 'mapped' and 'unmapped' SNAs have been removed. The amended ECO-R2 (indigenous vegetation clearance outside an SNA), includes a permitted activity standard (clause 1 and clause 4) that the indigenous vegetation clearance is not within an SNA. As noted in the Section 42A report<sup>2</sup>, this change does place the onus on the applicant to determine whether an area on private land constitutes an SNA. However, I agree that this is warranted given that the protection of significant indigenous vegetation and habitats of indigenous fauna are matters of national importance under s6(c) of the Resource Management Act (RMA). I consider that the workability of this is assisted by the fact that an advisory note is included in the plan to offer the support of the Council ecologist in formally confirming whether an area comprises a SNA.
18. The proposed changes also align with the precautionary approach required under Policy 3 of the National Policy Statement for Indigenous Biodiversity (NPS-IB). I consider that applying the precautionary approach is necessary within the proposed Plan provisions, as identified in the s32 Report<sup>3</sup> (Ecosystems and Biodiversity) and the expert evidence provided by Ecologist, Richard Clayton (para 23-35, pages 8-10) highlighting the few remaining areas of indigenous vegetation and habitats within the Waimakariri district and importance of these areas that support indigenous biodiversity.

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<sup>1</sup> Submission points 419.19, 419.73, 419.74, 419.75, 419.82, 419.92

<sup>2</sup> S42A report, Para 230, page 55

<sup>3</sup> Section 4 Key resource management issues

19. I agree that the proposed changes also give effect to Objective 9.2.3 and Policy 9.3.1 of the Canterbury Regional Policy Statement (CRPS) which seek to identify and protect significant indigenous vegetation and habitats. The CRPS sets out that District Plan provisions need to include appropriate rules that manage indigenous vegetation clearance within district plans to provide for the case-by-case assessments of whether an area of indigenous vegetation comprises a significant area that warrants protection.
20. In terms of the application of ECO-R2, I recommend an amendment to the rule is made to ensure that if an unmapped SNA is identified at the resource consent stage, the correct SNA policies and rules apply. This would be appropriate to avoid confusion and to ensure that the appropriate activity status is applied. I consider that it is important to retain ECO-R2 clause 1 and 4 within the rule as it provides a trigger for plan users to assess the site against the criteria set out in ECO-APP1 to ensure the area is not identified as a SNA.
21. The changes suggested, in my opinion, would align better with the objective and policies of the NPS-IB and CRPS where they relate to the protection of SNAs. It will also avoid confusion as to what applies if the clearance is identified as being within a SNA. Note that I have only included a change to the first part of the table given that the S42A report recommends the rules can be merged and apply to 'all of the ecological districts' under ECO-R2 (s42A report para 559, page 118).

ECO-R2 Indigenous Vegetation Clearance outside any Significant Natural Area

*Under the third column of the table add:*

**Where the indigenous vegetation clearance is identified as being within an SNA under Rule ECO R2 (1), Rule ECO-R1 applies and the ECO-R1 activity status when compliance is not achieved.**

### **Improved pasture approach**

22. I support the recommendation within the Section 42A report at Section 3.16.2 (page 126) that the definition of 'improved pasture' is retained as notified. The proposed plan definition of improved pasture states that it is:



*“an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production **since 31 December 1991\*** and species composition and growth has been modified and is being managed for livestock grazing. \*The aerial map series on Canterbury Maps- Basemap Gallery- Imagery Basemap type ‘Imagery 1995-1999’ can be used to help determine this at <https://canterburymaps.govt.nz/>”*

23. The additional reference (in comparison to the NPSIB definition) to December 1991 provides a benchmark from which to assess what the land use has been in the past. In my opinion, the inclusion of the guidance to the aerial map series provides clarity to plan users to guide the assessment as to whether the activity meets the definition of ‘improved pasture’.
24. The D-G’s further submission<sup>4</sup> supported the Canterbury Botanical Society (submission point 122.14) which sought the deletion of the allowance for indigenous vegetation clearance for the purpose of maintaining improved pasture from ECO-R2(3)(i) and ECO-R2(8)(b), as a lot of significant indigenous vegetation within the District, particularly dryland ecosystems, are on improved pasture. The Section 42A Officer rejects this submission point and recommends that the rule is retained as notified.
25. I agree that the NPS-IB provides for the maintenance of improved pasture for farming (as an established activity) under Policy 9 and that this is subject to Section 3.16 and 3.17. Section 3.16(2) requires that all other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA must be managed to give effect to the objective and policies of the NPS. Section 3.17 of the NPS-IB requires that Local Authorities must allow for the maintenance of improved pasture to continue provided that it does not affect an SNA (whether the pasture maintenance is within or outside an SNA) and provided that the area itself has not become an SNA, the land is not on uncultivated depositional landform and the maintenance of improved pasture will not adversely affect a Threatened or At Risk (declining) species (3.17(2)(c-e)).
26. The s42A report recommends that ECO-R2 (3)(i) and ECO-R2(8)(b) continues to provide for indigenous vegetation clearance that is required for the purpose of the maintenance of improved pasture (outside SNAs). I accept this recommendation,

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<sup>4</sup> Department of Conservation Further Submission: FS77

particularly given the proposed approach in the Plan to identify unmapped SNA areas that meet the ecological significance criteria set out in ECO-APP1. This aligns with the requirements under the NPS-IB, Section 3.17 to ensure that the improved pasture itself has not become an SNA.

### **Irrigation Infrastructure setback from a SNA – ECO-P2(3) and ECO-R4**

27. The proposed Waimakariri District Plan required, through rule ECO-R4 that any irrigation infrastructure shall be set back a minimum of 20 metres from any SNA. The D-G's submission supported this rule but sought that the setback was from all SNAs including those with a QEII covenant and not just 'mapped' SNAs. The D-G's submission also sought that the setback distance was increased from 20 metres to over 50 metres.
28. The s42A report recommends<sup>5</sup> based on the submissions received, that ECO-P2(3) is amended to refer to 'certain SNAs' and a consequential amendment to ECO-R4 is made to exclude wetlands from the setback requirement. The setback distance under ECO-R4 is recommended to be increased from 20 metres to 50 metres based on expert evidence provided by Ms Steel (Council ecologist).
29. I support the increased setback from 20 metres to 50 metres and agree that this rule aligns with the NPS-IB which seeks to protect SNAs by avoiding or managing adverse effects from new subdivision, use and development (Policy 7). I concur with the s42A Officer that the D-G's requested setback of 'more than 50 metres' is not certain enough to apply within the rule. As described in the expert evidence from the Ecologists, Ms Steel and Mr Clayton, there is evidence on the effects of irrigation infrastructure on areas of significant indigenous vegetation and habitats that supports the need for this setback rule.
30. I support the recommendation that the reference to 'mapped' SNAs and the QEII exemption is removed to clarify that the rule applies all SNAs, not only SNAs that are listed in the schedule in the Plan but also areas that meet the ecological significance criteria set out in ECO-APP1.
31. However, based on the expert evidence provided by Mr Clayton, I do not agree with the recommendation that the policy (ECO - P2(3)) and setback rule (ECO-P4) are

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<sup>5</sup> Section 3.23 page 154-159

amended to exclude irrigation infrastructure near to a wetland SNA. Mr Clayton notes (para 43, page 12) that “..*the hydrology of wetlands is far more complex than would be expected from an irrigation system applying water...*”. He gives the example of an ephemeral wetland which are not always wet and rely on periods of drying and inundation. Further he notes that “...*effects from irrigation on land are not limited to the application of water...*” and can include other methods such as increased nutrient and/or pesticide application. This is also commented on in Ms Steel’s evidence<sup>6</sup> noting that an exception for irrigation near a wetland should be on the condition that it’s judged to be beneficial for the ecosystem and that it’s just water and not the application of fertiliser or effluent.

32. Overall, given that irrigation infrastructure can be used in a range of ways that is not just limited to the application of water and given the hydrological complexities of wetlands as described in the evidence from Mr Clayton, it is considered appropriate to apply the irrigation infrastructure setback rule to wetland SNAs. This adopts a precautionary approach given the uncertainties around the benefits of irrigation infrastructure on wetlands (as per Policy 3 of the NPS-IB), particularly as it concerns adverse effects on significant indigenous biodiversity.

### **Proposed Changes to mapped SNA site boundaries**

33. The s42A Council report considers several submissions seeking amendments to the boundaries of certain mapped SNAs<sup>7</sup>. The D-G’s submission<sup>8</sup> supported the inclusion of Schedule ECO-SCHED1 which lists the mapped SNAs and sought that this was retained as notified. As a result of submissions, and advice from the Council Ecologist Ms Steel, the s42a Council Officer recommends<sup>9</sup> amendments to SNA034 Manor Park, SNA048 Island Road Remnant and SNA051 Taylors Bush.
34. I note that the submission from James Stephens on SNA 051 raised concerns<sup>10</sup> that the scheduling of the area would restrict a 10-year plan to enhance their property’s biodiversity by planting indigenous trees and controlling pest and weeds. The proposed rule relating to indigenous vegetation clearance (ECO-R1) does not restrict the planting of trees or controlling pest and weeds within the SNA. Further ECO-R3

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<sup>6</sup> Appendix C, pages 10-11

<sup>7</sup> Section 3.11, page 78

<sup>8</sup> Submission Point 419.91

<sup>10</sup> James Stephens submission point 100.1

enables (as a permitted activity) the planting of indigenous vegetation which would align with the submitter's plan to enhance biodiversity at the site.

35. In terms of SNA048 and SNA051, Mr Clayton (para 47, page 12) acknowledges that the proposed SNA boundaries do include areas dominated by woody and herbaceous exotic weeds. However, he considers that these areas provide a buffer to the small remnants of beech still present in the core of the habitat. His concerns are that if this buffer is removed, the remaining habitat will become heavily fragmented and subject to edge effects.
36. In regards to SNA034, Mr Clayton (para 46, pages 13) agrees with the original assessment of SNA034 by the Wildlands ecologist<sup>11</sup>, that the area of treeland is a legitimate part of the SNA. He therefore opposes the amendment to the boundary of this SNA as it would result in individual trees being singled out from the SNA site creating "isolated SNA islands" around the individual trees. The amended SNA boundaries would no longer form a continuous area reducing the additional function of the SNA as a 'buffer'. Mr Clayton notes that a better compromise would be to include more of this regenerating scrub surrounding the trees.
37. The NPS-IB defines<sup>12</sup> 'buffer' as:
- "..a defined space between core areas of ecological values and wider landscape that helps to reduce external pressures; and **buffering** has a corresponding meaning."*
38. The NPS-IB at Section 1.17 recognises that maintaining indigenous biodiversity requires 'buffering' around ecosystems used or occupied by indigenous biodiversity. Further, Criteria D set out in Appendix 1 of the NPS-IB<sup>13</sup> sets out that one of the key assessment principles is the contribution the area makes to protecting indigenous biodiversity in the wider landscape such as the characteristics that help maintain indigenous biodiversity in the area – such as size, shape and configuration.
39. Based on the ecological evidence from Mr Clayton and the need for buffering to maintain indigenous biodiversity from external pressures as set out in the NPS-IB, I recommend that the boundaries of these SNAs are retained as notified. It is

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<sup>11</sup> S42a Report, Appendix C SNA Assessment Report, HP023 Manor Park Bush

<sup>12</sup> NPS IB, Section 1.6, Interpretation, page 7

<sup>13</sup> NPS IB, Appendix 1: Criteria for identifying areas that qualify as significant natural areas (SNAs)

considered that the proposed SNA provisions do not prevent the planting of indigenous vegetation or controlling pest and weeds.

## Conclusion

40. I am generally supportive of the approach taken in the ECO chapter for the proposed Waimakariri District Plan, and the changes recommended in the s42A Report. Overall, the recommended changes have adopted many of the D-G's submission requests, and generally give better effect to the CRPS and NPSIB. Where I suggest further changes, these are mostly in order to provide clarity or alignment with the NPSIB.
41. I support the amendments to clarify within the proposed Plan that SNAs include both sites that are scheduled and mapped within the plan as well as sites that are assessed as SNAs against the ecological significance criteria at the resource consent stage. I have recommended a minor change to ECO-R2 to ensure that there is certainty about how the rules are applied if a site is assessed as a SNA against the criteria set out in ECO-APP1.
42. I consider that the setback of irrigation infrastructure of 50 metres should apply to wetlands that are SNAs and recommend amendments to Policy ECO-P2(3) and ECO-R4.
43. I recommend that the boundaries of the 3 SNAs that have been recommended to change are retained as notified based on the expert ecological evidence of Mr Clayton.



Elizabeth Williams

DATED 2 September 2024

**APPENDIX 1 TABLE OF SUBMISSION POINTS AND RECOMMENDATIONS**

This appendix summarises matters where I recommend changes to the wording of provisions where my opinion differs from what is proposed in the Section 42A Report. The table outlines the D-G’s submission points and officer’s recommendations, and includes the text of my suggested changes.

Note: Where submission points from the D-G’s submission are recommended for acceptance in the s 42A Report, and I concur with that recommendation, those submission points have not been included in this table.

PLAN PROVISION	REASON	RELIEF SOUGHT (changes in black bold text)	S42A recommendation	E Williams Planning evidence
<p>Definition 'Improved Pasture'</p> <p>Sub Point 419.13</p>	<p>The D-G has sought some additional wording for clarification, such as 'actively managed'. To be improved pasture the pasture should have been actively maintained and not abandoned. Considering the importance of this definition in the rule framework, this definition needs to be directive and certain.</p>	<p>Amend definition:            'Improved Pasture'  <i>means an area of land where exotic pasture species have been deliberately sown <del>or</del> <b>and</b> maintained for the purpose of pasture production since 31 December 1999* and species composition and growth has been modified and is being <b>actively</b> managed for livestock grazing.</i></p>	<p>Reject. Refer to Section 3.16.2:</p> <p><i>I consider that the definition of 'improved pasture' should ideally be amended to align with that of the NPSIB. However, I do not consider there is scope within any of these above submissions to make this recommended amendment as none seeks removal of the 31 December 1999 date...</i></p> <p><i>While I see the concern of DoC [419.13] regarding 'actively managed'; this request does not align with the definition of 'improved pasture' in the NPSIB, so I do not support it.</i></p>	<p>I support s42A report recommendation to keep the notified version of the definition of improved pasture.</p>
<p>ECO-P2 Protection &amp; Restoration of SNAs</p> <p>Sub Point 419.74</p>	<p>This policy wording has inconsistent use of the terms 'mapped SNA' and 'unmapped SNAs'. All SNAs should be treated equally as they are all considered significant regardless of mapped status. The reference "mapped" should be removed from this policy as it implies that irrigation near unmapped SNAs and planting within unmapped SNAs is appropriate. The proposed changes will help to protect and restore all SNAs which will help to give effect to the objective: ECO-O1: <i>Ecosystems and indigenous biodiversity</i>  <i>Overall, there is an increase in indigenous biodiversity throughout the District, comprising:</i></p> <ol style="list-style-type: none"> <li>1. <i>protected and restored SNAs;</i></li> <li>and</li> </ol> <p><i>other areas of indigenous vegetation and habitat of indigenous fauna that are maintained or enhanced.</i></p>	<p>The D-G seeks the following relief:  <b>ECO-P2 Protection and restoration of SNAs</b></p> <p><i>Protect and restore SNAs by:</i></p> <ol style="list-style-type: none"> <li>1. <i>limiting indigenous vegetation clearance within SNAs;</i></li> <li>2. <i>limiting <b>exotic</b> planting within <b>mapped</b> SNAs;</i></li> <li>3. <i>limiting irrigation near <b>mapped</b> SNAs in order to provide a buffer from edge effects;</i></li> <li>4. <i>providing for an on-site bonus allotment or bonus residential unit <b>incentive</b> within sites containing an <b>mapped-SNA which has been protected in perpetuity</b>;</i></li> <li>5. <i>supporting and promoting the use of covenants, reserves, management plans and community initiatives;</i></li> <li>6. <i>encouraging pest control; and</i></li> </ol> <p><i>working with and supporting landowners, the Regional Council, the Crown, Queen Elizabeth the Second National Trust, NZ Landcare Trust, and advocacy groups, including by providing information, advice and advocacy.</i></p>	<p>Accepted in part. The s42a report recommends a new approach for unmapped SNAs. Requires a 'case by case' assessment and includes an SNA as any SNA listed in ECO SCHED-1 and any other area that meets the SNA criteria. Refer to Section 3.8 and Section 3.19:</p> <p><i>I agree with the relief sought by DoC [419.74] in relation to having the same approach for mapped and unmapped SNAs, and note this will be addressed by the recommended amendment (refer to section 3.8) relating to the approach for unmapped SNAs. The resulting consequential amendment would be that ECO-P2's reference to 'mapped SNAs' would be amended to 'SNAs', which would therefore include other areas that are not listed in ECO-SCHED1 but meet the ECOAPP1 SNA criteria. As noted above, 'limiting planting' refers to providing for eco-sourced indigenous plantings only therefore I recommend rejecting this request to amend ECO-P2(2). I agree with DoC's requested amendments to ECO-P2(4) as it better clarifies the purpose of incentives.</i></p> <p>ECO-P2 - Protection and restoration of SNAs</p> <p>Protect and restore SNAs by:</p> <ol style="list-style-type: none"> <li>1. limiting indigenous vegetation clearance within SNAs;</li> <li>2. limiting planting within <b>mapped</b> SNAs;</li> <li>3. limiting irrigation near <b>mapped certain</b> SNAs in order to provide a buffer from edge effects;</li> <li>4. providing for an on-site bonus allotment or bonus residential unit <b>incentive</b> within sites containing a <b>mapped-SNA which has been protected in perpetuity</b>;</li> </ol>	<p>Overall, I support the Officer's s42A report recommendation.</p> <p>In regard to the changes proposed refer to my evidence regarding the unmapped SNA approach.</p> <p>In regard to Policy ECO- P2(3) relating to irrigation infrastructure setbacks from SNAs, I recommend removing the text 'certain' SNAs (see green strikethrough):</p> <p>ECO-P2 - Protection and restoration of SNAs</p> <p>Protect and restore SNAs by:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. limiting planting within <b>mapped</b> SNAs;</li> <li>3. limiting irrigation near <b>mapped certain</b> SNAs in order to provide a buffer from edge effects;</li> <li>4.-7. ...;</li> </ol>

PLAN PROVISION	REASON	RELIEF SOUGHT (changes in black bold text)	S42A recommendation	E Williams Planning evidence
			<p>5. supporting and promoting the use of covenants, reserves, management plans and community initiatives;</p> <p>6. <b>encouraging actively supporting and advising on pest and weed management, and stock management control</b>; and</p> <p>7. working with and supporting landowners, the Regional Council, the Crown, Queen Elizabeth the Second National Trust, NZ Landcare Trust, and advocacy groups, including by providing information, advice and advocacy.”</p>	
<p>ECO-R2</p> <p>Sub Point 419.82</p>	<p>The D-G supports the inclusion of these ECO policies and rules, advice note and matters of discretion.</p>	<p>Retain as notified.</p>	<p>Accept in part. Amendments recommended in response to other submissions.</p> <p>1. Indigenous vegetation clearance outside any <b>mapped Significant Natural Area SNA or unmapped SNA...</b></p> <p>Refer to other amendments to the rule in the S42a Appendix A.</p>	<p>I support s42A report approach, however, have recommended a change to clarify that if the indigenous vegetation clearance is located within a SNA, that ECO R1 and the activity status if compliance is not achieved applies (in green text):</p> <p>ECO-R2 Indigenous Vegetation Clearance outside any Significant Natural Area</p> <p><i>Under the third column of the table add:</i></p> <p><b><u>Where the indigenous vegetation clearance is identified as being within an SNA under Rule ECO-R2 (1), Rule ECO-R1 applies and the ECO-R1 activity status when compliance is not achieved.</u></b></p>
<p>ECO-R4</p> <p>Sub Point 419.89</p>	<p>The D-G supports the inclusion of this rule. Irrigation should be set back from all SNAS, not just Mapped SNAS. Support having a buffer distance. Data and peer-reviewed literature suggest effects of irrigation can extend out to 200 m.</p>	<p>The D-G seeks the following relief:</p> <p><b>ECO-R4 Irrigation infrastructure near any <del>mapped</del> SNA (All Zones)</b></p> <p><i>Activity status: PER</i></p> <p><i>Where:</i></p> <p><i>any new irrigation infrastructure shall be set back <b>&gt;50m a minimum of 20m</b> from any <del>mapped</del> SNA. <del>that is not part of a registered protective covenant under the Queen Elizabeth the Second National Trust Act 1977.</del></i></p>	<p>Accept in Part. I recommend the following amendments to ECO-R4 (refer to para 753-761):</p> <p><b>ECO-R4 - Irrigation infrastructure near any <del>mapped</del> SNA</b></p> <p><b>All Zones</b></p> <p><b>Activity status: PER</b></p> <p><i>Where:</i></p> <p>1. any <b>new</b> irrigation infrastructure shall be set back a minimum of <b>20m-50m</b> from any <del>mapped</del>-SNA <b>that is not a wetland</b> that is not part of a registered protective covenant under the Queen Elizabeth the Second National Trust Act 1977.”</p>	<p>I support the setback increase from 20 metres to 50 metres.</p> <p>I do not support the exclusion to the rule for a wetland SNA given the uncertainties around what the effects of infrastructure irrigation is on wetlands. I therefore recommend the following amendment (in green strikethrough):</p> <p><b>ECO-R4 - Irrigation infrastructure near any <del>mapped</del> SNA</b></p> <p><b>All Zones</b></p> <p><b>Activity status: PER</b></p> <p><i>Where:</i></p> <p>1. any <b>new</b> irrigation infrastructure shall be set back a minimum of <b>20m-50m</b> from any <del>mapped</del>-SNA <b>that is not a wetland</b> that is not part of a registered protective</p>



PLAN PROVISION	REASON	RELIEF SOUGHT (changes in black bold text)	S42A recommendation	E Williams Planning evidence
				<p>covenant under the Queen Elizabeth the Second National Trust Act 1977."</p> <p>And consequential change to ECO-P2(3) to remove the reference to <del>'certain'</del> SNAs...</p>
<p>ECO-SCHED1</p> <p>Sub Point 419.91</p>	<p>The D-G supports the inclusion of ECO-SCHED1.</p>	<p>Retain as notified.</p>	<p>Accept in Part. Amendments recommended in response to other submissions.</p> <p>Amendments proposed to the boundary of Manor Park SNA034, Taylors Bush SNA051 and SNA048 at 670 Island Road to reduce these areas.</p>	<p>Based on the ecological advice from Mr Clayton, I do not support the proposed changes to the boundaries of the three SNAs and recommend that the SNAs are mapped as notified.</p>
<p>Further Submission 77</p> <p>Sub Point 122.14</p> <p>Canterbury Botanical Society</p> <p>ECO-R2</p>	<p>Support the request to delete allowance for indigenous vegetation clearance for the purpose of maintaining improved pasture from ECO-R2.</p>	<p>Allow this submission point.</p>	<p>Reject. I recommend no amendments to the PDP in response to submissions [192.13 and 122.14] as they relate to the provision for the maintenance of improved pasture outside SNAs.</p>	<p>I support the s42A recommendation.</p>