

SUMMARY STATEMENT

1. The Canterbury Regional Council submission was generally supportive of the notified Proposed Waimakariri District Plan provisions subject to this hearing stream. The Regional Council did, however, seek some amendments to the provisions relating to the ecosystems and indigenous biodiversity chapter.
2. My evidence focuses on the recommendations that are important in giving effect to the Canterbury Regional Policy Statement along with relevant national direction, and to achieving the best outcomes for the ecosystems and indigenous biodiversity in the District.
3. I have reviewed the Section 42A report prepared by Ms Shelley Milosavljevic for the Waimakariri District Council.
4. All but two of the recommendations set out in the S42A reports address the matters addressed in the Regional Council's submission. My evidence therefore focusses on these two outstanding issues. These issues would be addressed by the suggested amendments as noted in Appendix 1 to my evidence in relation to ECO-P2 and ECO-R4, beyond that provided by the S42A report.
5. These requested amendments are in relation to, expanding ECO-P2 to include controlling cultivation and stock grazing, as well as irrigation near Significant Natural Areas (SNAs) to provide a buffer from edge effects rather than just limiting irrigation. I also request amending ECO-R4 to align with the amendments requested to ECO-P2. The is to better align with CRPS Policy 9.3.1 so that it applied to activities other than just irrigation.
6. The Regional Council supports the concept of protecting SNAs from edge effects. However, irrigation is not the only activity that can result in cross-boundary or edge effects on adjoining or nearby SNAs and in my opinion the policy should not be limited to one type of land use only.
7. Ms Milosavljevic agreed with the Regional Council's request for ECO-P2(3) to apply to all SNAs and not just those that are mapped but considers the request to cover more activities than just irrigation overly restrictive on existing activities.
8. I consider ECO-P2 and concurrently ECO-R4 as it is currently recommended by Ms Milosavljevic, does not give effect to Objective 9.2.2 and Policy 9.3.1 (3) of the CRPS and does not provide for protection of significant indigenous vegetation and habitats for indigenous species.
9. Dr Philip Grove provided evidence on behalf of the Regional Council in response to the S42A report and noted based on the recommendations from the S42A officer that we can anticipate further and ongoing reduction in ecological values for many of Waimakariri District's remaining SNAs. Areas identified as significant will not be protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities. I note that the effect of the proposed amendment to ECO-P2 and ECO R4 is that those activities

that have the potential to cause edge effects will require a resource consent before being able to take place. I consider that this is appropriate given the requirement in section 6 of the RMA to protect areas of significant indigenous vegetation. In my opinion this will also ensure that both Policy 9.3.1 (3) of the CRPS and Policy 6 of the NPSIB are given effect to.

10. I undertook an analysis of the costs and benefits of amending ECO-P2 and ECO-R4 to this effect and concluded that the benefits of imposing the control (from an environmental, economic and cultural standpoint) outweigh the costs. I set out recommended amendments in Appendix 1 of my evidence.
11. I note that in my recommended amendments to ECO-P2, I haven't included certain in the wording. I don't believe this is clear or helpful to plan users.