



10 September 2009

Ashburton District Council
PO Box 94
Ashburton

Dear Sir/Madam

Plan Change 10: Areas of Significant Nature Conservation Value

Introduction

1. This is a submission on Plan Change 10 (Areas of Significant Nature Conservation Value). The plan change proposes to amend the District Plan to reflect a review undertaken of sites that have been identified as having significant conservation value.
2. This submission is on behalf of the Central Office of Forest and Bird.

General Comments

3. Unfortunately Forest and Bird could not make a fully informed submission because there was very little information explaining the reasoning of the Council to include or exclude all or part of sites. Therefore this submission is based on the available information.
4. Forest and Bird supports all Group 2 sites being moved to Group 1 and being subject to council rules for protection.
5. However, Forest and Bird urges that all Group 2 sites that have been withheld from this process become Group 1 sites, and these sites be subject to this plan change.
6. Additionally, sites that have been excluded from the process because of tenure review or potential tenure review must have an ecological assessment and be included. If significant values exist, these sites should be included in this process and be subject to the appropriate rules that reflect their significance, regardless of land tenure.
7. However Forest and Bird remains concerned that there are potentially numerous ecologically significant areas within the District that remain to be identified. This is because the PNAP assessments that the current sites have been based on were created for different purpose to that of the Resource Management Act. The PNAP framework is too narrow to meet contemporary policy expectations for indigenous biodiversity protection. In addition, PNAP surveys are often incomplete. As a result, there are numerous and large areas within the Ashburton region that have significant biodiversity values that have been overlooked or are excluded. When looking at sites in this plan, this is especially obvious for the numerous

unprotected remnants that occur along the Canterbury Plains foothills. These remnants include nationally rare and threatened ecosystems that are of national priority to protect.

8. Accordingly, during the Council's Plan Review in 2010, Forest and Bird seeks that a full and comprehensive survey of the District is undertaken to determine the full extent of significant ecological values present.
9. Council's method of assessment and implementation has compromised the principles of significance and led to flawed assessments in some instances. Ecological surveys are intended to outline conservation values. Unfortunately some site boundary lines on maps seem to exclude adjoining or adjacent areas of equal value and some sites comprise only a small part of what is a much larger contiguous ecosystem of clearly equal significance. A percentage of an important area chosen as a "best site" does not reflect the overall significance of the remnant. The entire site of significance needs to be identified by the District Plan. Furthermore, compromises seem to have been made to exclude areas of significant vegetation without a clear ecological rationale for doing this.
10. With the methodology used, it also appears that there was little and/or inconsistent consideration of important ecological assessment criteria and principles, such as connectivity, buffering, diversity and pattern, rarity etc. Furthermore, there remains little or no information on habitat values for indigenous fauna.

Specific Site Concerns:

11. Below are three examples of concern. Forest and Bird's concern of implementation is not limited only to these three sites.

Site 28: Lake Emily

12. The boundary revision adjacent to the western side of Lake Emily appears to exclude parts of the wetland and eliminates the buffer zone important to the wetland complex. Farm development and stock grazing within this part of the site will most likely lead to degradation of the wetland ecosystem.
13. The previous buffer must be reinstated and the waterways that feed the wetland and wetland must be covered by the Plan as an ecological whole. The proposed boundary change could see degrading of the site by stocking next to waterbodies.
14. This suggests that there was little consideration of buffering, connectivity, ecosystem integrity and viability in this assessment.

Site 17: Mount Somers (part)

15. Although an improvement on boundary lines, parts of the forest are still excluded and it is not clear why. A percentage of an important area chosen as a "best site" does not reflect the overall significance of the wider forest remnant. Whole significant sites need to be covered.

Site: 14-03

16. This boundary is one of the worst. Straight(er) lines that encompass the site would be preferred. Important areas of riparian vegetation which would qualify as significant have been excluded with no obvious sound ecological reasoning. These areas need to be included within the protection boundaries for this sight to have its true significance acknowledged.

Relief Sought

17. Forest and Bird seeks:

- Group 2 sites that have been identified as being subject to Plan Change 10 should be included in Group 1; and
- Group 2 sites that have been identified that are not subject to Plan Change 10 should be included in this subject Plan Change.

Hearing

18. Forest and Bird wishes to be heard in support of this submission.

Kind regards,

Anna Cameron
Resource Management Planner