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Forest & Bird Southland Branch submission to Invercargill City Council District Plan

This submission by the Southland Branch of the Forest & Bird Society on the Invercargill City Council District Plan concentrates on the Biodiversity aspects of the plan. Our Society feels strongly that it is our biodiversity and natural features that make a major contribution to the distinctiveness of New Zealand and indeed the Invercargill District within New Zealand. Hence it is our biodiversity and natural features that contribute to our national identity. Therefore our society seeks strong Biodiversity Objectives, Policies and Rules within the Invercargill City District Plan.

Our society is generally supportive of the plan and the biodiversity provisions of the Invercargill City District Plan. Later in our submission we make some specific comments relating to sections of the plan. One major concern that we have with the plan is that the Biodiversity Rules only apply to areas of significant indigenous biodiversity and then only areas that are shown on the planning maps. While we appreciate that the Invercargill City Council (ICC) is trying to provide certainty to landowners by having the link to the planning maps this does a disservice to biodiversity and will inevitably result in further biodiversity losses. We request that significant biodiversity recognised should not solely be shown on planning maps but also be able to be recognised through to use of appropriate criteria.

Deficiencies of the Planning Maps

Although the ICC area is relatively compact it does contain a wide range of biodiversity and natural features and values. Indeed the ICC area contains some nationally important features including part of the Awarua-Waituna Ramsar Wetland of International Importance (including Seaward Moss Conservation Area, Awarua Bay, New River Estuary and part of Tiwai Peninsula), the diversity and condition of vegetation on Tiwai Peninsula, also the sand dunes and sand surfaces retaining indigenous forest and other vegetation found in Otatara and Sandy Point that has sequences across several thousand years. There are also many regionally and locally important areas. Not all these natural features have been adequately defined in the planning maps. Areas where the greatest deficiencies of identification of significant vegetation on the planning maps are:

- Wetlands in the south of the ICC district;

- Forests in Otatara and Omaui-Greenhills area (stands of regenerating forest are frequently not included)
- The margins of estuaries (including New River Estuary, Mokomoko Inlet, Awarua Bay and Bluff Harbour)
- Coastal vegetation (including sand dunes, gravel beaches, coastal turf vegetation and others)
- Tiwai Peninsula (some areas of significant indigenous biodiversity are not mapped, including areas within the Tiwai sub area).

Section 3.1.4 (A) of the plan references the four priorities from the Statement of National Priorities for Protecting Rare and Threatened Biodiversity on Private Land.. None of these four national biodiversity priorities is adequately defined on the planning maps, therefore these national priorities will not be adequately implemented. In particular:

- 1) Threatened Land Environments of New Zealand: The extent of threatened LENZ within the ICC district is not shown or included on the planning maps.
- 2) Wetlands and Dunes: These are nationally important and much reduced ecosystems. The full extent of wetlands and dunes remaining has not been mapped.
- 3) Naturally Rare Ecosystems: There are several of these present within the ICC district. These are not listed and they are not all fully identified or mapped.
- 4) Threatened Species: No threatened species sites appear to be mapped.

We are also concerned that the use of planning maps and/or schedules as the sole indicator of significant vegetation results in other deficiencies. The planning maps are set in time and will not be updated for at least 10 years. This means that they are not flexible and so that new information can not be taken into account. It also means that changes in public opinion and expectations are not able to be taken into account. It also means that areas that are regenerating and improving in condition are not able to be added.

Another major concern with the plan is that only significant indigenous vegetation is included on the planning maps or covered by the rules. What is considered significant? Even regenerating vegetation provides significant habitat for indigenous species. The ICC District has lost so much indigenous vegetation and habitat that all remaining habitat should be included. The consent process is the appropriate mechanism to judge the significance and hence conditions to be set for the activity.

The need for district wide biodiversity rules

During the term of the previous ICC district plan Southland and ICC district has undergone a period of dramatic land use change and intensification. During this period much land development occurred, including considerable areas of wetlands in the south of the district. The previous plan only had biodiversity rules apply to the Otatara sub area. This non regulatory approach failed dismally and resulted in a large amount of the wetlands and red tussocklands in private ownership being converted to pasture. Through this approach the ICC encouraged the destruction of extensive areas of indigenous vegetation and habitats of indigenous species. These rare habitats can

not be replaced. Therefore we strongly support the adoption of district wide biodiversity rules.

Widening the inclusion of affected party status

The ICC have no ecologist employed and indeed has very limited expertise in ecology or biodiversity. Therefore staff with very limited expertise or experience in biodiversity are involved in assessing resource consents over significant biodiversity. It is therefore recommended that the ICC utilise independent ecologists to assist with these consents and related issues. We also request that the Department of Conservation and Environment Southland are involved in these consents as affected parties.

Specific sections of the District Plan

Section 2.2 We support this section.

Section 2.3 We generally support this section, however we have some concerns including:

Section 2.3: Additional criteria should include information from ecological surveys and reports. There are several surveys and reports that document important biodiversity (e.g. The Southland Plains Ecological District Protected Natural Areas Programme survey report).

Section 2.3.3 Policy 1: As discussed above we are concerned that the maps are the sole means of determining significant indigenous biodiversity. We are concerned that the extent of significant biodiversity appears not to have been updated since 1999. This is grossly inadequate!

Policy 5: An additional initiative should include (D) Indigenous species

Section 2.3.4 We generally support this section, however we have some comments.

Method 1: We support the use of Planning Maps we do not believe these should be the sole method of determining significance.

Method 2: We strongly support the use of rules.

Section 3.1: We generally support this section, however we have some comments.

We are opposed to the rules only applying to areas shown on planning maps. I have previously discussed this issue.

Section 3.1.5 We support this section. Ecological assessments need to be undertaken by suitably qualified or skilled people. If this can not be demonstrated the application should be publically notified.

The Forest & Bird Society would like to be heard to support this submission.

Craig Carson

Chairman

Southland Branch

Royal Forest & Bird Protection Society

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