



# Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

To: Hearing Commissioners Timaru District Plan Review

9 May 2024

Re: Hearing A – Overarching Matters, Part 1 and Strategic Directions: Answers to Panel Questions

BY EMAIL: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)

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1. In its original submission, F&B asked for natural and historic heritage to be separated into two objectives – was it our intention to leave cultural heritage out?  
*That was not our intention. We considered that cultural was captured within “heritage” and we wanted to be sure that the SD appropriately recognised the importance of both the natural and historic heritage in the district. Our intention was an SD for both natural and historic. We have no issue with the officer’s proposed amendments to SD-O2 to address the submissions of DOC and Fonterra, and that help to reflect the importance of the district’s natural and historic heritage.*
2. Does the definition for domestic gardens include shelter belts?  
*In Forest & Bird’s original submission, we recommended to not include shelter belts in the definition for domestic garden. Shelter belts occur throughout the district in rural and urban areas. Shelter belts can be important foraging habitat for native fauna, especially for the nationally critical pekapeka/Long tailed bat, so should be treated different to domestic gardens. Very old shelter belts may also provide potential pekapeka roosting habitat. There should be at least a requirement to assess (by a suitably qualified expert) a shelter belt particularly where it is located within the bat overlay area, as potential pekapeka foraging or roosting habitat before it is removed or otherwise. It may be that our concerns can be addressed in the ECO or other chapters rather than by changing the definition.*
3. At para 21, is there a contradiction? What is the difference between reduce and minimise?  
*Reduce works better because this is an objective to “reduce adverse effects on the environment”. The term “minimising” would be more appropriate if we were talking about “minimising the adverse effects of an activity.” However, this is an overarching objective for what is anticipated for settlement patterns and that they are consolidated and integrated to reduce adverse effects on the environment. They can be interpreted similarly but they are not the same.*

*Reduce is a better word for an objective. Minimise is a better word for policy, for how to achieve the objective. For example minimising adverse effects may be one of the ways you achieve that objective. The words can be interpreted similarly but they are not the same.*

Please do contact Forest & Bird if you require further information. Thank you.

Kind regards,  
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