

Submission- Timaru District Council Proposed District Plan

Form 5

Submission on Notified Proposal for Plan, Change or Variation Clause 6 of Schedule 1, Resource Management Act 1991

To:

Timaru District Council

Name of submitter:

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Introduction:

Zolve Environmental Ltd is a local environmental consultancy and project management company based in Timaru. Our primary services include:

- Environmental Project Management & Strategy
- Health, Safety & Wellbeing development, implementation & Support
- Stakeholder Consultation, alignment, and project development
- Compliance and regulatory analysis and management

We are currently operating in the Timaru district, providing services to both the public and private sectors. Some of our key local projects are the Pekapeka Protection Project and Te Ahi Tarakihi Creek Restoration, along with a wide breadth of environmental services we provide to a large local forestry company. We are heavily engaged in the local community and appreciate the opportunity to submit on the Proposed District Plan.

1. This is a submission on the Proposed Timaru District Plan.
2. I could not gain an advantage in trade competition through this submission.
3. The specific provisions of the proposal that my submission relates to are related to **the Natural Environment Values Section**, in particular, the following rules:
 - a. **ECO-R4: Clearance of trees in the Long-Tailed Bat Protection Area.**
 - b. **NATC-R4: Construction of fences.**
 - c. **NFL-R4: Construction of fences, including earthworks.**

4. Our submission is based on the need for practical and pragmatic solutions to support biodiversity and conservation outcomes. We support the Timaru District Councils' focus and ambition on supporting indigenous biodiversity; this has been proven through the proactive approach to the Significant Natural Areas mapping that has been completed.

However, biodiversity and our indigenous flora and fauna will not be protected and/or enhanced in this 'reserve style' approach without strategic alignment, pest control and active management.

Although the significant values and areas have been identified, we feel the areas without active support and management are potentially still declining; there is high potential for the council and other stakeholders to develop strategic direction across the district to align conservation projects, utilising the limited remaining and fragmented natural landscapes and achieve significant biodiversity outcomes. However, without support for landowners and communities who are providing ecosystem services, this opportunity could be lost.

A key submission point relates to the Pekapeka protection rule. The requirement for a qualified ecologist to complete the Pekapeka roost assessment does not align with the current Department of Conservation protocols, processes, and technology. The South Canterbury Long-tailed Working Group raised this previously and recommended a slight amendment which is included and supported in this submission- **(refer to Appendix A)**.

Currently, there is a significant amount of prospecting for new Pekapeka habitats within the Timaru District. Pekapeka are a highly mobile species and have multiple roost trees. They are specifically vulnerable during their maternal roosting period (October- March).

Based on this, we also query if the overlay/ mapping approach is appropriate and/or extended enough to provide the protection needed.

Overall, we support the proposed district plan regarding the conservation and biodiversity directions however request that strategic planning and an extensive stakeholder engagement approach be adopted.

It should also be noted that we, Zolve Environmental Ltd, support our clients Port Blakely Forestry submission in its entirety.

5. I seek the following decision from the local authority detailed in **Appendix A**.
6. I wish to be heard in support of my submission, and I will consider presenting a joint case at a hearing.

We thank you for the opportunity to engage and submit on the Timaru District Council Proposed District Plan.

Signature of submitter:



Date:

14th December 2022

Appendix A

Chapter / Sub-part	Specific provision	Position	Reason for submission	Decisions requested / relief sought
ECO- Ecosystems & Indigenous Biodiversity	ECO-R4	Amend	The current requirements for an ecological assessment do not align with the current Department of Conservation Protocols and processes.	Change requirement for a 'qualified ecologist' to 'Suitably qualified person as deemed competent by the Department of Conservation'.
ECO- Ecosystems & Indigenous Biodiversity	ECO-R4	Amend	The current Long-tailed Bat overlay does not include some newly found colonies or allow for the discovery of new colonies and the provisions needed to protect Pekapeka at their most vulnerable maternal roosting period.	Extend Bat Protection Area to include all known colonies and surrounding areas. Include a more extensive buffer on the Bat Protection Area to trigger ECO-R4 rules during maternal roosting timeframes.
NATC- Natural Character	NATC-R4	Amend	Restricting fencing to post and wire does not allow for predator fencing for conservation purposes. Considering these areas are more significant to the district regarding biodiversity values, seems possible this is where conservation projects requiring predator fencing may be applied.	Amend to include a rule 'or fencing requirements for conservation purposes'.
NFL- Natural Features and Landscapes	NFL-R4	Amend	Restricting fencing to post and wire does not allow for predator fencing for conservation purposes. Considering these areas are more significant to the district regarding biodiversity values, seems possible this is where conservation projects requiring predator fencing may be applied.	Amend to include a rule 'or fencing requirements for conservation purposes'. Also allow indigenous vegetation clearance if it is for the purpose of conservation outcomes such as erecting a predator fence.