



LANDPRO

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16 January 2024

Landpro Reference 22702:
Council Reference: APP-20233491

Subject: Response to Environment Southland technical advice on APP-20233491

Included below is a summary of key points and issues identified in the technical advice provided by Dave Burgess, Polly Bulling and Darin Sutherland in the relation to the activities proposed in application APP-20233491.

- A properly designed and maintained predator-proof area is considered sufficient mitigation for the loss of wetland habitat given the significant biodiversity benefits such an area would have, however the extent to which the applicant intends to create a predator free environment is not clearly conveyed in Assessment of Environmental Effects;
- There is general agreement that the wetland environment has been adequately assessed and described in the Ecological Assessment attached to the AEE. There are points of disagreement, for example, what conditions are favourable for carex growth, however these are not material to the assessment of the proposed activity;
- There are some minor points of disagreement in what constitutes appropriate mitigation, for example ragwort control and removal of willows.
- Mitigation planting should not utilise fertiliser and if pest species are eradicated from the Pocket, the use of combi guards is not required;
- The fence, wetland boundary and parcel boundaries have not been effectively mapped to demonstrate the location of the fence relative to conservation land and the full extent of the wetland in the northern corner of the Pocket;
- The construction methodology for the proposed track has not been clearly defined; and
- Damage to the wetland in the norther corner of the Pocket needs to remedied.

Mapping

Attached as Appendix A are two maps, the first identifies the extent of the propsoed fence line relative to the boundary of the wetland and Section 3 Block VI Te Anau SD (the Pocket), the second identifies the full extent of the proposed predator proof fence within the Pocket.

Pest management/eradication within the Pocket.

The applicant is proposing to fence a large portion of land within the Pocket and eradicate pest fauna species from within the fenced area. Attached as Appendix A is a map (ref: 210032 12/01/2024) that identifies the full length of the fence that is propsoed to be installed. The following conditions are

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volunteered by the applicant to ensure pest eradication is achieved inside the predator free area and maintained to ensure the adverse effects of the proposed activities are offset.

x. The consent holder shall install the fence identified in [insert plan reference] within one year of commencing works. The fence shall be constructed as per information submitted with APP-20233491.

Advice note: Commencement of works shall occur when the consent holder installs any part of the fence or access track authorised by this resource consent.

x. At least 10 working days prior to exercising this resource consent, the consent holder shall submit a Pest Management Plan (PMP) to [insert ES contact] for certification by.

x. The PMP shall include, but not be limited to:

- a. Measures for the eradication of deer, rats, possums, mustelids, feral cats, feral pigs and goats within the predator free area;
- b. The Planting Plan submitted with APP-20233491;
- c. Ongoing monitoring of animal pest species inside the predator free area;
- d. Reporting requirements; and
- d. Names and contact details of staff responsible for implementing the PMP.

x. The consent holder shall report annually to [insert ES contact] for a period of three years on the implementation of the PMP. As a minimum the consent holder shall confirm what pest species have been eradicated inside the predator free area, any cases of pest species gaining access to the predator free area and continued efforts to eradicate any remaining pest species.

x. Works authorised by this consent shall not commence until the consent holder has received written certification of the PMP from the consent authority.

x. Notwithstanding Condition X, if the PMP has not been certified within ten working days of the consent authority receiving the CMP, works may commence.

Planting Plan amendments

Attached as Appendix B is an updated version of the Planting Plan submitted with the application for resource consent. The following amendments have been made in response to advice received from Environment Southland technical advisors:

- Fertiliser will not be used in wetland areas;
- Combi guards will not be used following the eradication of the pests the Pocket;

- Ragwort control will be monitored for six years;
- Clarifying location of willow removal;

Construction activities

The applicant volunteers the following conditions in recognition that the fence, track and culvert construction methodologies have not been confirmed and will need to vary dependent on site conditions encountered.

- x. At least 10 working days prior to exercising this resource consent, the consent holder must prepare a Construction Management Plan (CMP) and submit it for certification by [insert ES contact].
- x. The CMP shall include, but not be limited to:
 - a. A description of different construction methodologies for the fence, track and culverts;
 - b. An indicative plan identifying where the different construction methodologies will be implemented;
 - c. Names and contact details of staff responsible for implementing the CMP in order to achieve the requirements of this consent;
 - d. A description of all relevant site operations and procedures
 - e. All consent conditions and any other mitigation measures to be employed to minimise environmental effects and/or adhere to best practice; and
 - f. Relevant monitoring and reporting requirements.

The Consent Holder may review and update the QMP where it is to modify SOPs.

- x. Works authorised by this consent shall not commence until the consent holder has received written certification of the CMP from the consent authority.
- x. Notwithstanding Condition X, if the CMP has not been certified within five working days of the consent authority receiving the CMP, works may commence.

Remediation of damage to wetland

As per the Assessment of Environmental Effects, an area of 300 m² has already been disturbed across the northern end of the wetland. This work was undertaken without resource consent. On 11 May 2022 the applicant received an abatement notice that requires the following remediation steps to be undertaken:

- Remove all the imported gravel from the fence line out of The Pocket. Avoid damaging adjacent, intact vegetation;
- Remove all culverts to allow water to freely drain through the remediated area;
- Replace soil that has been removed from the fence line back on to the fence line, this includes carefully scraping all soil from the top of adjacent living vegetation.
- Ensure that all mechanical equipment is well-cleaned and free of mud and plant seeds prior to any work, to ensure seeds of exotic weeds are not introduced into the wetland;
- Replant the remediated fence line with wetland species that are locally dominant. Replanting of wetland plant species Please note that the Biodiversity Department at Environment Southland can assist you with designing a planting plan; and
- Provide the Compliance Department at Environment Southland with a remediation plan, including dates by which replacing of soil will take place, when planting is expected to be completed by and a plan on how the area will be monitored to prevent invasive plant species establishing.

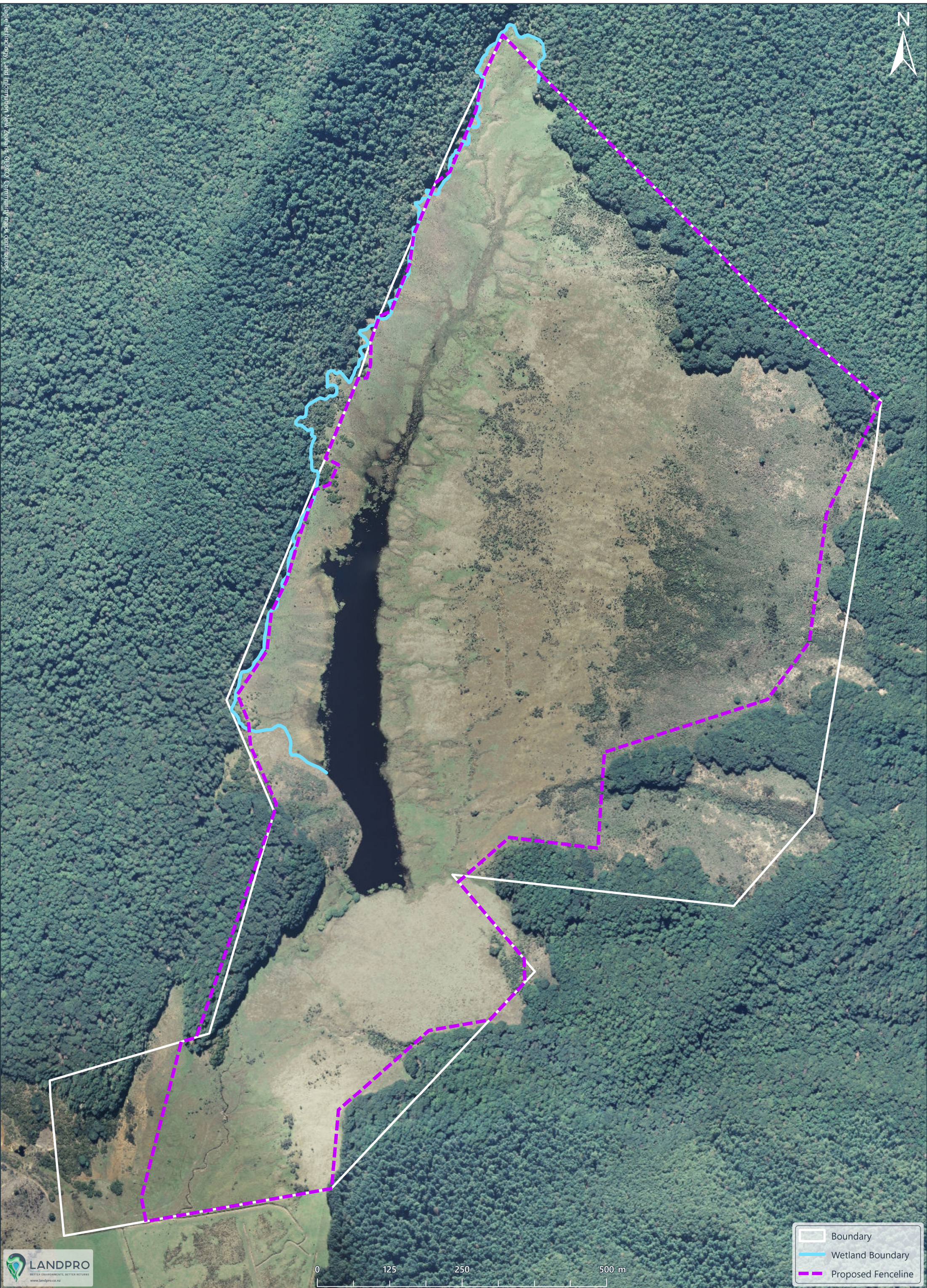
Should consent be granted, it is proposed that the fence and track is installed as per consent conditions and any wetland disturbed outside the fence and track footprint is remediated in accordance with the Planting Plan. It is noted that the Planting Plan was developed to offset the effect of the proposed activities and works already completed.

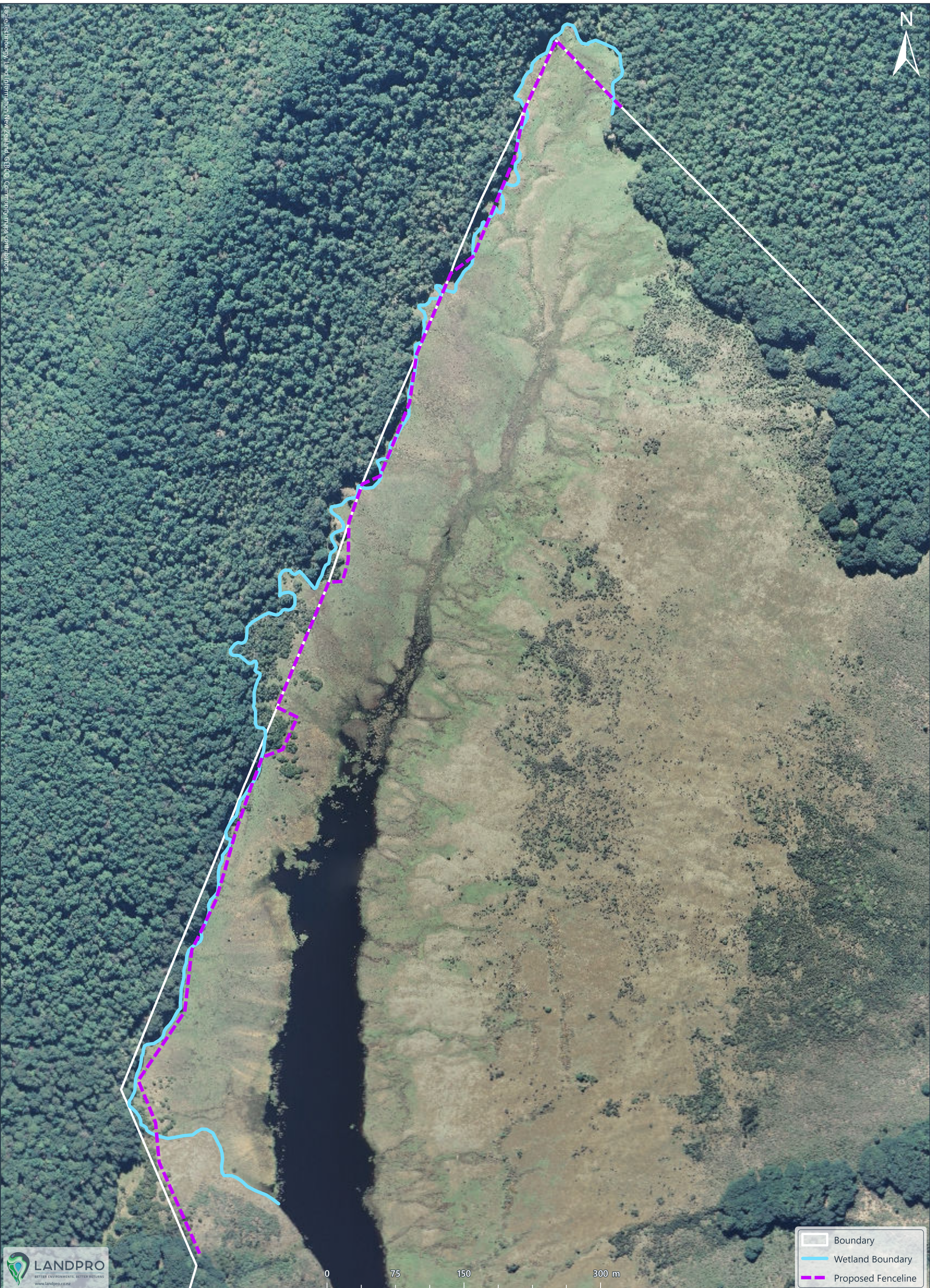
Summary

The applicant is open to amending proposed conditions in line with council's expectations, providing the intent of the conditions is maintained and compliance is practical and achievable.

Should amendments to the proposed conditions be required to address the concerns raised in the technical reviews, the applicant requests a brief meeting with council's planner to discuss new and amended conditions.

Appendix A: Updated maps





	Boundary
	Wetland Boundary
	Proposed Fenceline

Appendix B: Updated Planting plan