



MEMORANDUM

To: Hearing Panel for the Proposed West Coast Regional Land and Water Plan – Plan Change 1

cc. Alyce Melrose, Policy Planner, West Coast Regional Council
Mark Davies, Director Operations, Western South Island, Department of Conservation
Joy Comrie, Statutory Manager, Western South Island, Department of Conservation
Linda Kirk, RMA Planner, Christchurch, Department of Conservation
Dean van Mierlo, Counsel Acting on Behalf of the Director-General of Conservation

From: Jane Marshall, Technical Advisor Ecology, Biodiversity, Terrestrial Ecosystems and Species, Christchurch Team, Department of Conservation

Subject: **Ecologist Response to Questions received from the Hearing Panel to Proposed West Coast Regional Land and Water Plan – Plan Change 1**

Date: 25 June 2018

Dear Sirs

Please find my response to the questions you have raised during the hearing for the Proposed West Coast Regional Land and Water Plan – Plan Change 1.

Question in regards to Don and Dianne Bradley

1. On April 12th 2013 Hamish Fairbairn sent a letter to Don and Dianne saying that the area was not wetland. In Don and Dianne Evidence submitted to the Council, Don states that on “Thursday May 29th 2014 Hamish Fairbairn and DOC ecologist Jane Marshall came to look at the mapped area. Her words to myself and my wife on that day after the inspection were “it is all too modified to be deemed a wetland and I will not change my mind.” A week later Hamish Fairbairn phoned wanting a meeting with himself and Jane Marshall at the Regional Council office. Jane said she had changed her mind on the boundaries, wanting the southern area excluded.” What are the factors that led you to change your mind?

My Response:

I have no comment about a letter between Mr Fairbairn and Mr and Mrs Bradley.

That is not my recollection of the conversations shared with the Bradleys on the day of the field trip. While I have not kept notes, the conversation I recall was around the fact that I could agree that not all of the mapped wetland was still a functioning wetland (and I would not change my mind about that) because in the northern part of the mapped area a) the natural hydrological process of above and below ground water flow was altered and impeded by significant drains which had dried this part and b) this drying out of the soils and disruption to ground water hydrology supported the growth of the over sown pasture species and gorse amongst other vegetation.

My understanding is that the Bradleys then requested another meeting at the regional council where by my recollection we repeated our conversations about the process of this work with the Land and Water plan, and covered much the same discussion as we had on farm about the land and its status as wetland. In summary, I did not 'change my mind', but my recollection of my comment to the Bradley's was that 'not all of the mapped wetland was a functioning wetland', not, as the Bradley's are suggesting, that 'its all too modified to be a wetland'.

Sphagnum Moss harvesting

1. Would you be more comfortable with a permitted activity rule if some of the other recommendations in the Buxton Report, such as the % criteria in recommendation 5, the heavy vehicle weight distribution ratio of 3.5psi in recommendation 6, and recommendation 7, were brought into the Rule?

My Response:

No. Please also refer to response for 2 below.

2. While we understand your goal was not to assess the significance of the wetland, do wetlands with moss suitable for harvesting generally have the same or similar values or features as opposed to wetlands where harvesting does not occur?

My Response:

In response to the question of whether wetlands with moss suitable for harvesting generally have the same or similar values or features – I would say no they do not have the same or similar values or features necessarily, to wetlands where harvesting does not occur.

OR

If the Hearing Panel are asking if wetlands with moss that is suitable for harvest have the same values as wetlands where harvesting does not occur – I would say again no, not necessarily. That is why an ecological assessment of the Schedule 2 wetlands is appropriate to determine the values of the

wetland and for the decision maker to be able to have the necessary information to make an informed decision on a case-by-case basis.

I'm struggling to understand exactly what this question is trying to identify.

Thank you for the opportunity to respond to these matters. I hope that this is of assistance and please contact me if you need any clarification or have any further questions.

Yours sincerely

Dr Jane Marshall