

16 December 2024

Dunedin City Council
50 The Octagon
Dunedin

via EMAIL: districtplansubmissions@dcc.govt.nz

Otago Regional Council submission on the Dunedin City Council's Plan Change 1 – Minor Improvements (PC-2024-1)

Dear Sir/Madam

Otago Regional Council submission on the Dunedin City Council's Plan Change 1 (Minor Amendments) to the second-generation Dunedin District Plan (2GP).

Introduction

Otago Regional Council (ORC) continues to appreciate its engagement with Dunedin City Council (DCC) to both support its development of the 2GP and contribute feedback on matters where we share common interests and overlapping responsibilities.

We have reviewed the proposed Plan Change 1 and over all are supportive of DCC making changes to give greater clarity and efficiency to plan provisions. We make the following submissions on two proposed changes:

Change: TreeX (Substantive changes to the scheduled of Trees)

ORC holds concerns that the STEM system used by DCC as a means of calculating the value of a tree has a bias that does not recognise the importance of indigenous biodiversity values and as such may unduly promote trees with values that do not achieve the best outcomes for the district's biodiversity.

Examples of this can be seen in the 2GP (Schedule of Trees A1.3) where Sycamore trees (*Acer pseudoplatanus*) are classified as a pest under the Otago Regional Pest Management Plan 2019¹ (RPMP). The current approach in the RPMP to Sycamores is 'site led' management, meaning that areas that are defined which have important biodiversity and other values to protect. The goal is to progressively contain sycamore in these areas to prevent or improve on damage to the indigenous ecosystem values at these sites. The sites defined in the RPMP are all located within the Dunedin City Council boundary.

¹ https://www.orc.govt.nz/media/10068/orc-regional-pest-management-plan-2019-29_final_corrected-21.pdf

While Sycamores referenced within the 2GP 'Schedule of Trees' may be outside of current 'site-led' areas for Sycamores under the RPMP, we would encourage the DCC to consider reflecting the risk presented by Sycamores such that they should not have protection under the 2GP.

ORC proposes there is scope for both Councils to collaborate on changes to the STEM system to ensure that the values associated with indigenous tree species are included in the assessment programme and weighted appropriately.

ORC submits that DCC consider that species of trees that are identified in the Otago RPMP as pests should not be provided protection under the 2GP's Schedule of Trees.

Change: NE7 (Additions to the ASBV schedule on public land)

ORC supports the purpose and scope of this proposed change as it will contribute to protecting and enhancing public land with areas of significant indigenous vegetation and habitats of indigenous fauna.

This gives effect to provisions of the Regional Policy Statement 2019 (RPS 2019_) and the proposed Regional Policy Statement 2021 (Decisions version – currently under appeal), in particular:

- **Objective 3.1 and Policy 3.1.9** Ecosystems and indigenous biological diversity (RPS 2019)
- Relevant Objectives and policies of the Eco chapter, and particularly method **ECO-M4A** (Increasing indigenous vegetation cover – pRPS21))

If there is the opportunity to speak to our submission, we would welcome this.

Yours sincerely



Gretchen Robertson

Chairperson