DOC-7839436

Department of Conservation
Te Papa Atawhai

18 December 2024

Dunedin City Council
PO Box 5045
Dunedin 9054

Attention: Submission on Plan Change 1

Email: districtplansubmissions@dcc.govt.nz

Dear Sir/Madam,

Submission on Plan Change 1: Minor Improvements

Please find enclosed the submission by the Director-General of Conservation in respect of proposed Plan Change 1 to the Partially Operative Second Generation Dunedin City District Plan 2024 (2GP). The submission identifies the Director-General's position on a number of proposed changes.

In particular, the D-G strongly supports the addition of new Areas of Significant Biodiversity Value (ASBVs) and extensions of existing ASBVs proposed as Change **NE7**. I would like to take this opportunity to also encourage the Council to start work on scheduling ASBVs on private or leasehold land in accordance with the provisions set out in the National Policy Statement for Indigenous Biodiversity 2023. It is also recommended that **Appendix 10A.1** Threatened Plant Species List is updated to reflect the latest threat classifications set out in the document 'Conservation Status of vascular plants in Aotearoa New Zealand, 2023'.

In regard to proposed change **NE13** and the site located at 245 Tomahawk Road the D-G does not seek any changes in relation to the ASBV mapped area (C096).

The D-G has no concerns regarding proposed changes **Tree2** (updates to recorded location of existing scheduled tree groups at Quarantine Island) or **RES13** which maps watercourses on Crown land as 'stormwater open watercourse mapped areas' and the associated provisions.

Please contact Liz Williams in the first instance if you wish to discuss any of the matters raised in this submission (email: lwilliams@doc.govt.nz phone: 027 253 8586).

Yours sincerely

Gabriel Davies

Operations Manager, Coastal Otago

Form 5: Submission on notified proposal for policy statement or plan, change or variation

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991

To: Dunedin City Council (**the Council**)

Name of submitter: Director-General of Conservation (the **Director-General**)

1. This is a submission on the following proposed plan change:

   Plan Change 1 – Minor Improvements

2. I could not gain an advantage in trade competition through this submission

3. The specific provisions of the proposal that my submission relates, and the detailed decisions sought to are set out in **Attachment 1** to this submission.

4. I **seek** the following decision from the Council:

   a. That the particular provisions of Proposed Plan [Change 1] that I support, as identified in Attachment 1, are retained;

   b. Further or alternative relief to like effect to that sought in 4.a. above.

5. The decisions sought in this submission are required to ensure that the Plan Change 1:

   a. Recognises and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act;

   b. Gives effect to the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB);

   c. Promotes the sustainable management of natural and physical resources; and

   d. The relief sought is necessary, appropriate and sound resource management practice.

6. I wish to be heard in support of my submission, and if others make a similar submission, I will consider presenting a joint case with them at the hearing.

Gabriel Davies

Operations Manager

Coastal Otago

Department of Conservation

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation

Date: 18 December 2024

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

Attn: Liz Williams, RM Senior Planner

lwilliams@doc.govt.nz and cc to: RMA@doc.govt.nz

027 253 8586

Department of Conservation

John Wickliffe House

Level 1/265 Princes Street,

Dunedin,

9016

ATTACHMENT 1:

PROPOSED PLAN CHANGE 1: MINOR IMPROVEMENTS
SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

The specific provisions that my submission relates to are set out below, together with my positions, reasons and decisions I seek from the Council.

PLAN CHANGE REFERENCE AND PROVISIONS	SUPPORT/OPPOSE	REASON	RELIEF SOUGHT
NE7 – The new additions and amendments to the ASBV schedule (A1.2) on public land and associated changes to the provisions listed within the Plan Change Summary of Changes document dated 20 November 2024 (page 14).	Support	The D-G considers that the proposed changes are consistent with the objective, policy and provisions of the National Policy Statement for Indigenous Biodiversity and Otago Regional Policy Statement.	Retain as notified.
CP11 – Activity definition for walking and biking tracks and relevant provisions listed within the Plan Change Summary of Changes document dated 20 November (page 6 and 7).	Support	The D-G supports the proposed amendments to ensure the definition of walking track falls within the definition of community and leisure activity and the amendments to the Recreation Zone rules to permit large scale recreation tracks. This will improve Plan clarity and allows a more enabling approach to recreation activities within the Plan.	Retain as notified.

PLAN CHANGE REFERENCE AND PROVISIONS	SUPPORT/OPPOSE	REASON	RELIEF SOUGHT
REC2- Corrections made to the Recreation Zone provisions to ensure activities in Outstanding Natural Feature, Outstanding Natural Landscape, Significant Natural Landscape and High Natural Coastal Character overlay zones are manged and associated changes as described within the Plan Change Summary of Changes document dated 20 November (page 18).	Support	The D-G supports this proposed change as it ensures that these areas are protected from inappropriate development and their values are maintained, preserved or enhanced.	Retain as notified.