

MEMORANDUM

Date: 11 August 2022

From: Dr Greg Burrell (Instream Consulting)

To: Jocelyn Lewes (Selwyn District Council)

Subject: Review of Ecological Assessment for PC81 Rolleston

1. INTRODUCTION

Private plan change request 81 (PC81) to Selwyn District Council (SDC) involves a proposal to rezone approximately 28 hectares of Rural-zoned land to the west of Rolleston. The area is referred to as the Skellerup South Block in the plan change application. This memorandum reviews ecological aspects of PC81 and it has been prepared to support the council's S42A report. In preparing this memorandum, I have reviewed the following documents provided by the applicant:

- Taylor, M. (2021a). Ecological values in the Skellerup South Block (Rolleston Industrial Developments Ltd.). Letter to Bruce van Duyn of Rolleston Industrial Developments Ltd, from Aquatic Ecology Ltd, dated 29 September 2021.
- Taylor, M. (2021b). Plan change 81 – Skellerup South Block – s92 response. Letter to Jocelyn Lewes, from Aquatic Ecology Ltd, dated 17 December 2021.
- Novogroup (2022). Request for change to the Selwyn District Plan, prepared for Rolleston Developments Limited, March 2022. Including:
 - Attachment 4: Proposed Outline Development Plan (ODP) text.
 - Attachment 5: Proposed ODP.

The September 2021 ecological assessment of Mr Taylor was attached to both the original application and the updated application in March 2022. Mr Taylor's December 2021 letter was attached to the S92 response from the applicant but was not included in the updated application in March.

I am familiar with the location, having previously undertaken fish sampling and fish salvage at multiple locations along the Paparua Water Race network, including sites near Rolleston. I have also provided ecology advice to SDC in relation to nearby plan change applications PC73 and PC82. I have no conflict of interest with this application.

2. ECOLOGY REPORT REVIEW

The two ecology letters from Mr Taylor assesses ecological values via a desktop review of existing information, coupled with review of photographs provided by the client and accessed via Google Maps. The September 2021 assessment states that a water race, part of the Paparua water race network, flows into the Skellerup South Block, terminating at a soak

hole/pond. The assessment notes the presence of two other ponds on the property, in addition to the water race and soak hole. The September assessment states that the aquatic features are artificial and that because they are not natural, they are not defined as wetlands under the Canterbury Land and Water Regional Plan. Both the September and December assessments state that aquatic ecology values on the Skellerup South Block are likely low, based on review of aerial photographs, the artificial and modified nature of the waterways, and the fact that the water race is at the end of a long network. The September assessment recommends relocating any fish present in the water race prior to decommissioning. Mr Taylor also states in both his letters that the ecological state of the waterway could be verified by undertaking an ecology field survey.

The amended plan change application (dated March 2002) notes at paragraph 88 that *'closure of the water race will be subject to a separate Selwyn District Council approval process, at which time ecological values of the waterway are typically a consideration.'* However, I note that the text of the amended ODP states that the existing water race will be decommissioned as part of the subdivision, with no mention of the decommissioning being subject to the results of an ecological assessment.

I agree with Mr Taylor that ecological values associated with waterways on the Skellerup South Block are likely to be low. That is a reasonable assumption, given the modified agricultural landscape. I also agree with Mr Taylor that this should be confirmed via an ecological assessment. That is because aerial imagery shows ponded areas on the property that vary in extent since at least the early 1980s. The ponded areas could simply be stock watering holes or they could be wetlands, which are greatly diminished in extent in lowland Canterbury. Because of their rarity, wetlands have inherent biodiversity value, even when some measures of ecological value (e.g., native plant or fish diversity) are low.

An ecological assessment would establish whether the ponded areas meet the RMA definition of a wetland, or the narrower definition of natural wetlands in the National Policy Statement for Freshwater Management 2020 (NPS-FM). If the ponded areas are deemed natural wetlands, then any subdivision would be subject to provisions of both the NPS-FM and the National Environmental Standards for Freshwater 2020 (NES).

In my opinion, the ODP text regarding the existing water race should be changed to better reflect the sentiment of the application documents that support it. In particular, the ODP text should include words to the effect that prior to subdivision, a field-based ecological assessment should be carried out to confirm ecological values. The assessment should include recommendations about whether any wetland features on the property should be retained, plus guidance on ecological enhancement and waterway realignment. The subdivision layout should be amended to incorporate results of the ecological assessment, if necessary.

MEMORANDUM

Date: 11 August 2022

From: Dr Greg Burrell (Instream Consulting)

To: Jocelyn Lewes (Selwyn District Council)

Subject: Review of Ecological Assessment for PC82 Rolleston

1. INTRODUCTION

Private plan change application 82 (PC82) to Selwyn District Council (SDC) involves a proposal to rezone approximately 110 hectares of Rural-zoned land to the west of Rolleston. The proposed area to be rezoned is referred to as Brookside in the application. This memorandum reviews ecological aspects of PC82 and it has been prepared to support the council's S42A report. In preparing this memorandum, I have reviewed the following documents provided by the applicant:

- Taylor, M. (2021). Plan change 82 – response to s92 request. Letter to Jocelyn Lewes, from Aquatic Ecology Ltd, dated 17 December 2021.
- Aston Consultants (2022). Application for private plan change: Brookside Road Residential Ltd. Submitted to Selwyn District Council, March 2022. Including:
 - Appendix 2: Proposed Outline Development Plan (ODP).

I am familiar with the location, having previously undertaken fish sampling and fish salvage at multiple locations along the Paparua Water Race network, including sites near Rolleston. I have also provided ecology advice to SDC in relation to nearby plan change applications PC73 and PC81. I have no conflict of interest with this application.

2. ECOLOGY REPORT REVIEW

The brief ecology report of Taylor (2021) assesses ecological values via a desktop review of existing information, including review of Google Street View imagery. A water race, part of the Paparua water race network, is noted as flowing through the Brookside block. The report states that the water race is likely to have '*at least moderate ecological value*', based on the likely presence of native upland bullies, common bullies, shortfin eel, longfin eel, and freshwater crayfish, or kōura.

The ecology report refers to another plan change application nearby (PC73), where it is proposed to retain the same water race, as well as a 10 m minimum setback and vegetated buffer. The ecology report states that a similar treatment (i.e., retaining the water race with a vegetated buffer) could also be considered for PC81. The ODP narrative attached to the updated plan change application states that the water race '*can be retained and realigned. Further investigation of its ecological values can be undertaken at subdivision stage, including the feasibility and desirability of its possible naturalisation and integration as part of the urban*

environment. It is therefore uncertain whether the water race will be retained and whether further ecological assessment will occur.

I agree with Mr Taylor that the water race on the PC81 land may support moderate ecological values, based on the information provided. I also generally agree with the sentiment of the ODP narrative but suggest that it is altered slightly to more clearly state that further investigation of ecological values will be undertaken at the subdivision stage. Thus, the sentence in the previous paragraph (page 4, paragraph 2, sentence 2 of the ODP) could be changed from '*Further investigation of its ecological values can be undertaken...*' to '*Further investigation of its ecological values shall be undertaken...*'.