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	Response Date	Aug 22 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference: GRUZ-R13 (and others such as ASW-R3)	
Q4	Feedback/Comments  LINZ submits that draft rule GRUZ-R13 should be amended to permit biodiversity and biosecurity activities without further restriction. Such an amendment would support biodiversity outcomes and ensure coherence of GRUZ-R13 with the broader goals of the draft District Plan as well as other rules within it, such as ASW-R3.	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents? 0	
Q12	If you need more space, or have any other general comments, please leave them here	

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To whom it may concern

**Submission of Toitū Te Whenua Land Information New Zealand on Waitaki District Council Draft District Plan**

This is a submission by Toitū Te Whenua Land Information New Zealand (LINZ), with respect to Waitaki District Council's draft District Plan.

The purpose of this submission is to outline a possible unintended consequence of the proposed rule GRUZ-R13. As written, the rule could impact biosecurity activities and limit the ability of landowners, such as LINZ, to be responsible managers of the land.

**Toitū Te Whenua Land Information New Zealand**

LINZ has a comprehensive biosecurity programme. The biosecurity programme covers Crown lands and waterways, as well as certain Jobs for Nature funded projects and joint-agency programmes.

LINZ undertakes several biodiversity and biosecurity projects within the bounds of Waitaki District Council, including:

- an annual pest and weed control programme on LINZ managed lands and waterways in Canterbury,
- predator control in the Huxley, Hopkins, and Temple valleys as part of the South Canterbury High Country Project (delivered in partnership with the Department of Conservation), and
- supporting the reestablishment of native habitats through the Te Rūnanga o Moeraki Restoration Project.

LINZ's biodiversity and biosecurity work is not legislated, meaning there is no specific statutory power or obligation in LINZ-administered legislation for the Crown to undertake

weed or pest control. The absence of specific statutory power means that LINZ's biosecurity activities are subject to general rules such as those contained in District Plans.

### **Draft District Plan implications**

The draft Waitaki District Council District Plan proposes to allow the use of airstrips and landing pads solely for primary production activities. Otherwise, the use of these airstrips and landing pads is subject to certain requirements or restrictions such as on the number of aircraft movements or needing to be an electric powered aircraft.

A number of LINZ's biodiversity and biosecurity activities are undertaken aurally, such as aerial poison baiting. Alternatives to such aerial measures are unfeasible or significantly cost prohibitive. Aerial biosecurity activities are not allowed for under the current proposed wording of the rule, meaning that such activities would be subject to a maximum number of aircraft movements per week.

Restricting the use of aircrafts for biosecurity purposes would significantly affect LINZ's ability to effectively and efficiently carry out its biosecurity functions. Biosecurity activities could be delayed, allowing pest or weed populations to increase, or risk insufficient availability of aircraft for biosecurity purposes (through restrictions on flight numbers).

Allowing pest or weed populations to rapidly increase has an adverse effect on more than just the ecosystems themselves. Further impacts include affecting recreational activities and economic activities, for example where weeds block dams to the extent that electricity generation is impacted.

### **LINZ submission**

In light of the above, LINZ submits that draft rule GRUZ-R13 should be amended to permit biodiversity and biosecurity activities without further restriction. Such an amendment would support biodiversity outcomes and ensure coherence of GRUZ-R13 with the broader goals of the draft District Plan as well as other rules within it, such as ASW-R3.

We welcome any questions you may have about this submission.

Yours sincerely



**Tracey Burton**

**Manager Biosecurity and Biodiversity**

Crown Property

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