

UNDER the Local Government Act 2002
AND Section 22AB of the Land Transport Act 1998
IN THE MATTER of a proposed Bylaw using a Special Consultative Procedure

FURTHER SUBMISSIONS BY Royal Forest & Bird Protection Society of NZ Inc
PREPARED BY Debs Martin
DATE 1 December 2021

1. As outlined in Procedural Minute 4 issued by Commissioners dated 26 November 2021, Forest & Bird submits the following information as provided for at paragraph (6) and as discussed during the hearing on 24 November 2021.

2. **Fur seal breeding season**

The fur seal/*kekeno* (*Arctocephalus forsteri*) breeding season is mid-November until mid-January. Further information can be found on the DOC (Department of Conservation) website: [Facts about New Zealand fur seal \(doc.govt.nz\)](https://www.doc.govt.nz/facts-about-new-zealand-fur-seal/)

3. **Geopreservation inventory**

In the paper we submitted to Council we referred to this inventory. The pink shaded areas are all geopreservation areas within the area under consideration for the bylaw. For completeness, in addition to the ones referenced in our report to Council in March 2018, I have included all of those within the area subject to the bylaw and their various importance and vulnerability.

[New Zealand Geopreservation Inventory \(geomarine.org.nz\)](https://www.geomarine.org.nz/)

Site Name	Assessment of Importance	Assessment of vulnerability to human damage
Blind River mouth Pliocene fossils	C	3
Lake Grassmere and bar	B	2
Chancet Rocks Cretaceous/Tertiary boundary	A	1
Ward Beach concretions and wave cut platforms	C	3
Flaxbourne River folds and thrusts	C	3
Needles Point pinnacles and Cretaceous/Tertiary boundary	B	3
Waima dunefield	C	2

The description of the assessments of significance and vulnerability is available on the website, and provided here for reference:

Assessment of importance:

A = of international scientific, aesthetic or educational value

B = of national scientific, aesthetic or educational value

C = of regional scientific, aesthetic or educational value

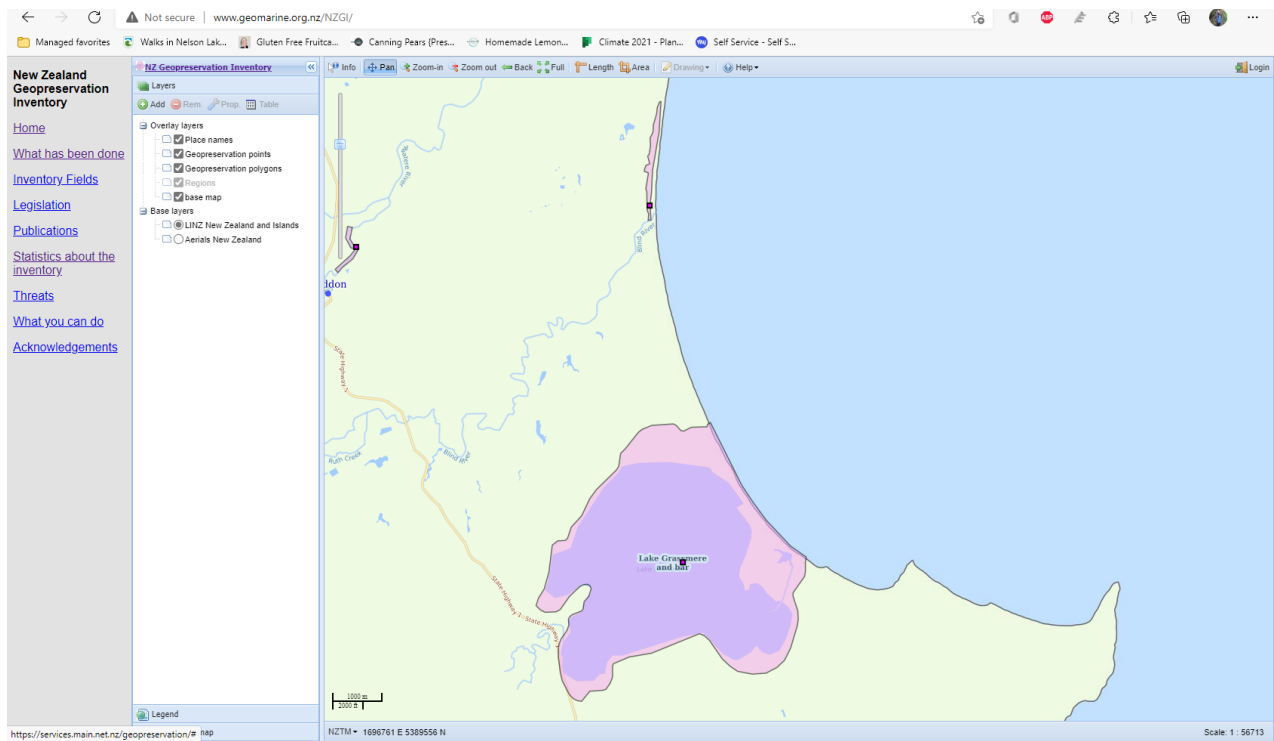
Assessment of vulnerability to human damage:

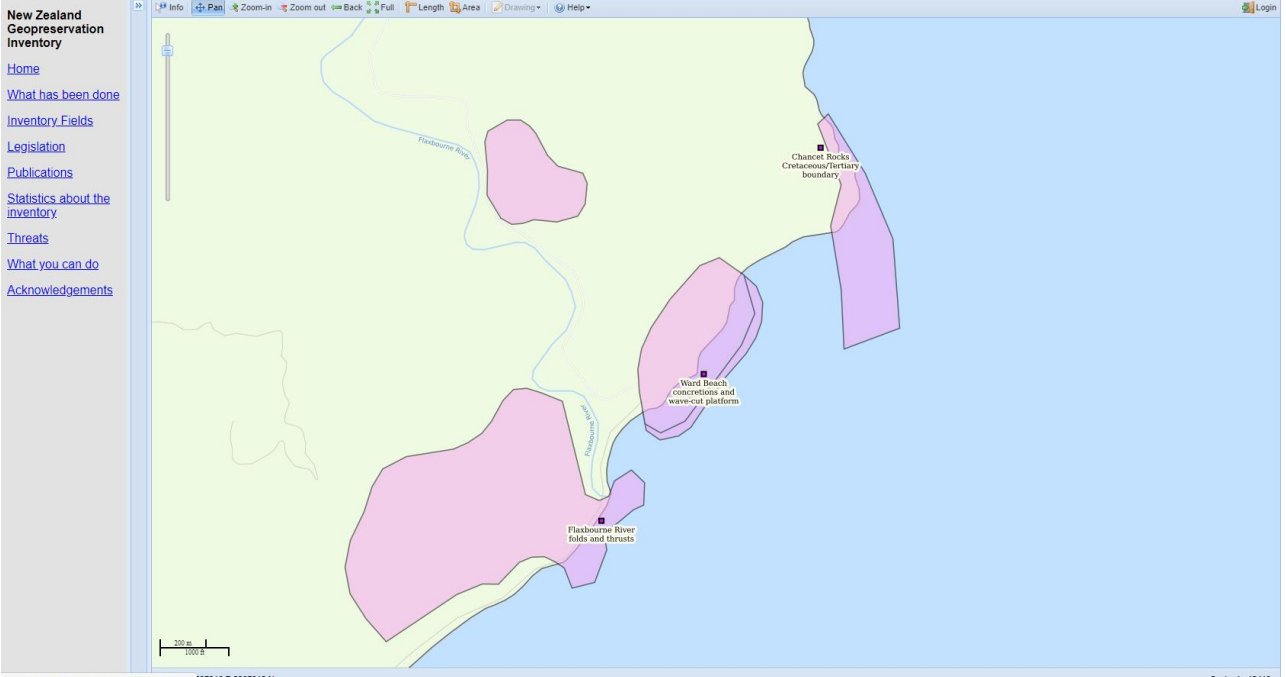
1 = vulnerable to complete destruction by human-related activities

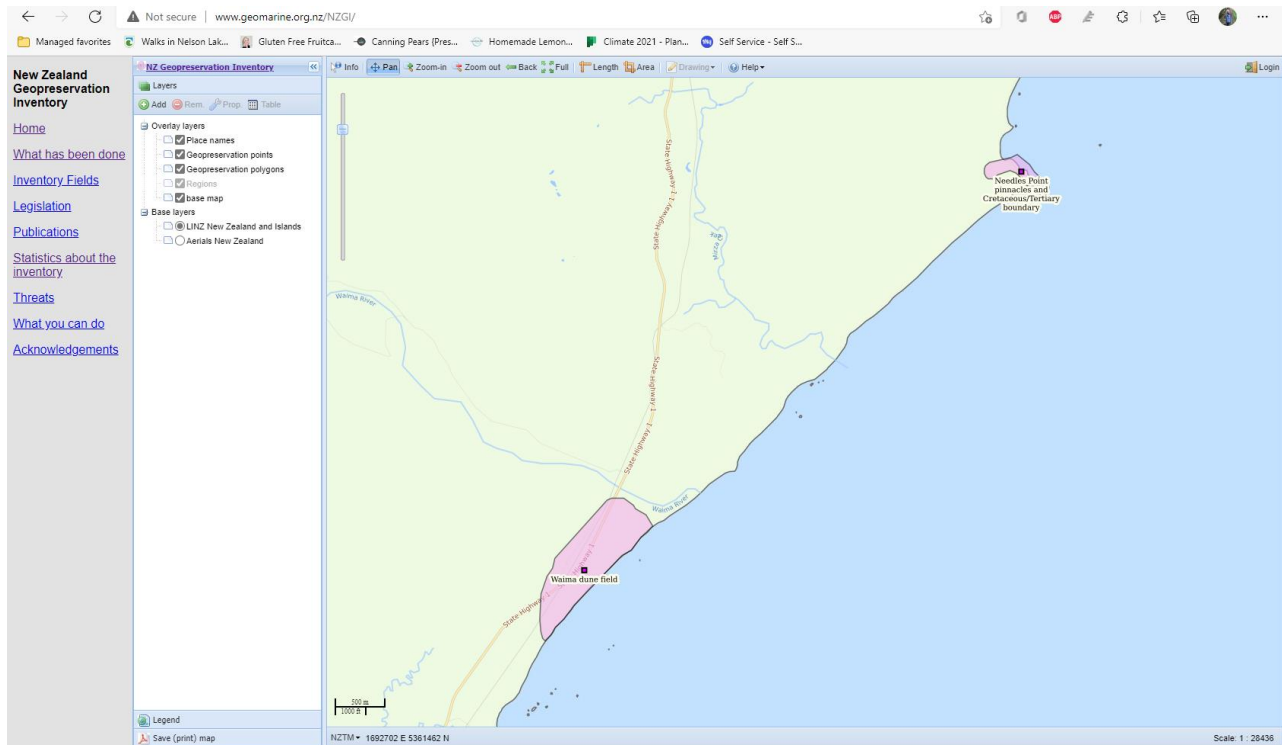
2 = vulnerable to significant damage by human-related activities

3 = robust and not considered to be vulnerable to most human-related activities

4 = values (e.g. rock exposure) could be improved by targeted human-related activities







4. Birds nesting/breeding within the proposed Bylaw area

The birds nesting within the area are best characterised in the technical report prepared by Council. The Ornithological Society/Birds NZ may have more information, but I have not been able to source that information in the timeframe available, other than what was included in our original submission. I understand other submitters may also have further information which may be helpful, e.g. Ailsa Howard's work on banded dotterels; surveys undertaken by members of the East Coast Protection Group Inc.

5. Areas and/or maps of nesting birds

Again, these are better provided in the technical report prepared by Council. We do not have specific maps available. Forest & Bird understands that the East Coast Protection Group Inc have been doing research on the species and sites of nesting birds along the coast over this past year, as a result of a recent successful funding application. That information may be able to be provided by the ECPG Inc to the hearing panel.

6. Threat status of plants outlined in presentation to Council hearing.

A full range of plant species should be sought from Council and/or the Department of Conservation. Ones included in our presentation to Council in 2018 (and their national threat ranking) were:

Marlborough rock daisy, *Pachystegia insignis*, ubiquitous to Marlborough, not threatened.

NZ daphne, *Pimelea prostrata*, not threatened

Shrub daisy/coastal tree daisy, *Olearia solandri*, not threatened

Tauhinu, *Ozothamnus leptophyllus*, not threatened

Coastal flax, *Phormium cookianum*, not threatened

Sand sedge, *Carex pumila*, not threatened

Shore bindweed, *Calystgia soldanella*, not threatened

Shore buttercup, *Ranunculus acaulis*, uncommon along the Marlborough coast, not threatened

Note: threat ranking is not the only measure of the importance of biological systems. It is the characteristic of the whole ecosystem and the interconnectedness of its various parts.