

SUBMISSION ON THE PUBLICLY NOTIFIED DISTRICT PLAN – STAGE TWO (2)

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TO: QUEESNTOWN LAKES DISTRICT COUNCIL

NAME OF SUBMITTER: THE ALPINE GROUP LIMITED (ALPINE)

SCOPE: CHAPTERS – 2, 3, 6, 21 & 33 & ANY OTHER
PROVISIONS RELATING TO DEFINITIONS,
STRATEGIC DIRECTION, LANDSCAPES, RURAL
ZONE & INDIGENOUS VEGETATION AND BIODIVERSITY

Alpine is a local family owned and operated company with interests in Pastoral Farming, Tourism, Aviation and Primary Processing & Exports. The business has been operating in the Queenstown Lakes District for over sixty (60) years. The business farms Minaret Station on the western shores of Lake Wanaka.

Alpine submitted on 5 points:

1. Commercial Recreational Activities – ACCEPTED
2. Informal Airports – ACCEPTED
3. Rural Industrial Sub Zone – ACCEPTED
4. Clearance of Indigenous Vegetation – REJECTED
5. Significant Natural Areas - REJECTED

CLEARANCE OF INDIGENOUS VEGETATION

The intent of the review of the rules pertaining to clearance of indigenous vegetation was to simplify the process and provide clarity as to what was acceptable and what was not. In effect the rules now create less clarity and do not achieve the objectives and policies of the Strategic Directions section. They preclude the objectives of the Rural Zone being achieved that promote farming as the predominant land use. In effect the rules are difficult to interpret and unclear. What's more, the issues identified in recent litigation (Royal Forest and Bird Society of New Zealand v. Dougal Innes) have most certainly not been addressed.

There is a distinct conflict between the protection of vegetation and efficient land use. Provisions 33.3.3 outline the performance standards for vegetation clearance rules. In essence the rules reintroduce the original definition from the old plan but are arguably more confusing with lower percentage thresholds and a heightened emphasis on threatened plant species.

Alpine categorically rejects the inference that the clearance of indigenous vegetation would include the deliberate application of water where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion. The retention of rural character areas is often dependent on the ongoing viability of farming. It is anticipated that evolving forms of agricultural land use may change the landscape which would include normal farm development. Irrigation practices are an anticipated and deliberate farming activity in a region such as the Queenstown Lakes District. It would therefore be fundamentally wrong to associate a normal farming practice with deliberate clearance of indigenous vegetation when evolving use of agricultural land anticipates changes in the landscape. It is useful to record that Royal Forest and Bird Society have had their submission seeking over sowing and topdressing be included in the definition of clearance rejected. These activities have a similar intent to that of irrigation forming part of normal farm development and good husbandry practices.

Alpine categorically rejects the inclusion of a threatened species list. It creates a subjective platform which, on the discovery of a single plant, trigger the rules. There is a distinct difference between rare and threatened and any list would be highly generalised when considering the differences in environment even within the district.

SIGNIFICANT NATURAL AREAS – MINARET STATION

We support the initiative of the identification of Significant Natural Areas however; the goal posts have undoubtedly been shifted in the 15-years it has taken for the Council to implement the Environment Court Decision. The criteria used to identify SNAs as outlined in Council's S32 Evaluation Report differ from the those in the Environment Court Decision in that they are more generalised.

The use of the LENZ Classification as an assessment of vegetation values is inappropriate. I quote the Department of Conservation from the Minaret Station Conservation Resources Report:

"Attributing significance to LENZ units must be treated with caution. Work is currently underway to improve the accuracy of the underlying spatial data. For example, soils data is being upgraded, as a median patch size for polygons sourced from Land Resource Inventory is currently between 10,000 and 100,000 hectares, while LENZ units cover areas as small as 10 hectares."

The process of assessment for Minaret Station was essentially a desktop overview. No effort was made to conduct a detailed ground assessment of the proposed areas. The assessments for Minaret Station initially identified 6 areas of interest as potential SNAs. The standard of assessment was questionable in that of the 6 areas:

1. Assessment first utilised Google Earth then for some properties involved a flyover
2. Department of Conservation land was included
3. Vegetation that was consented for clearance by QLDC was included
4. Land scheduled in the ORC Plan: Water as a regionally significant wetland was included
5. All of the land proposed as an SNA is farmed

Of the 6 areas initially proposed 2 were removed, 2 were put forward to be considered as SNAs and 2 were put forward as recommended SNAs. Whilst it was inevitable that we would sit here today to discuss the 2 recommended areas, to the best of my knowledge there has been no further assessment of the 2 areas to be considered as SNAs.

Minaret Station is a Pastoral Lease. The tenure provides another layer of control over activities on the land including the clearing of vegetation. Pastoral Leases are also subject to Tenure Review which defines the use of the land between economic and conservation use taking into account associated values. The Council has specifically excluded land managed by the Department of Conservation in the SNA process. Pastoral Lease land should be treated the same as conservation land which is consistent with other parts of the Plan – refer aircraft landings and commercial recreation activities.

Normal farming practices would become significantly constrained within an SNA but aside from this little analysis has been done by the Council to identify the encumbrance or valuation considerations caused by SNA status.