

**IN THE MATTER**

Of the Resource Management Act  
1991

**AND**

**IN THE MATTER OF**

Queenstown Lakes District  
Proposed Plan  
Chapter 3 Strategic Directions

By

Queenstown Lakes District Council

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Submissions by Susan Elizabeth Maturin  
On behalf of the Royal Forest and Bird Protection Society

March 2016

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## Introduction

1. My name is Susan Elizabeth Maturin. I am the Regional Manager Conservation Otago/Southland for the Royal Forest and Bird Protection Society.
2. I have an MSc Hons in Natural Resource Management, specialising in ecology and over 20 years experience working in ecological management, resource management, planning and conservation in Canterbury, Waitaki, Otago and Southland.
3. Forest and Bird is a national organisation comprising over 70,000 members and supporters in 56 branches throughout New Zealand, including Central Otago Lakes. The main object of the Society is to take all reasonable steps within the power of the Society to preserve and protect New Zealand's remaining flora and fauna, and natural features of New Zealand, for the benefit of the public including future generations.
4. I represent the National Office of the Forest and Bird Protection Society.
5. Today I am here to present further arguments in support of Forest and Bird's original and further submissions and our responses to the Section 42 Report and its recommendations, (The Report).

## Goal 1 Develop a prosperous, resilient and equitable economy

### Objective 3.2.1.4 – recommended renumbered as 3.2.1.6 and reworded

*Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided ~~a sensitive approach is taken to~~ adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated*

6. Forest and Bird supports The Report's recommendations as it removes the ambiguity created by the imprecise words a sensitive approach. Forest and Bird also supports not adopting words such as "are appropriately considered" for the same reason.

## Goal 4 The Protection of our natural environment and ecosystems

7. Forest and Bird supports the Plan providing a strong and unambiguous policy framework dealing with the protection of the district's natural environment and ecosystems.

### Objective 3.2.4.1

*Promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.*

8. Forest and Bird's submission supported Goal 4 and noted that Objective 3.2.4.1 as above needed to include recognition for Council's duty to maintain indigenous biodiversity. We are pleased to note that The Report recommends an amendment to include ensuring that development and activities maintain indigenous biodiversity. We support this recommendation.

**Policy 3.2.4.2.1**

***Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure their protection***

9. Forest and Bird's submission seeks to amend the above policy so that it sets out more clearly the strategic direction for the protection and management of significant indigenous vegetation and habitats, (SNA's). Fundamental to this is how the Plan will deal with mapping and protection of known SNA's and how to protect those that have not been identified and mapped, as it is inevitable that not all potential SNA's will be identified or included in the Plan. While this is dealt with in Chapter 33 in policy 33.2.1, as The Report notes, "*Repetition can however serve a reinforcing purpose.*"
10. Plain reading of Objective 3.2.4.2 and policy 3.2.4.2.1 is that it only applies to the protection of identified areas which are defined as those referred to as Significant Natural Areas on the District Plan maps. This may give plan readers the impression that if an area is not identified on a planning map then it won't be significant.
11. This is in conflict with Policy 33.2.1 which specifies that there will be ongoing identification of SNA's through resource consent applications.
12. Forest and Bird is concerned that indigenous vegetation continues to be cleared and that some of this is likely to have qualified as an SNA. Given the significance of much of what remains in the lowlands where the development pressure is greatest, and that identification and protection of SNA's is a nationally important matter Forest and Bird considers it important that the Chapter setting the strategic Direction be very clear that there will be ongoing identification and protection of SNA's.
13. A more elegant way of incorporating this, than suggested in our original submission could be:  
*Ensure the protection and ongoing identification of areas of significant indigenous vegetation and significant habitats of indigenous fauna, through scheduling them in the District Plan and through resource consents.*

**Policy 3.2.4.2.2**

*Where adverse effects on nature conservation values cannot be avoided, remedied or mitigated, consider environmental compensation as an alternative.*

14. Forest and Bird agrees with The Report recommendation to delete this policy.

**Objective 3.2.4.4 –**

*Avoid exotic vegetation with the potential to spread and naturalise*

15. The Report recommends amending this objective to better focus on the environmental outcome, which are said to include landscape and nature conservation values. The

Report in its analysis of this objective notes that wilding species are a threat to the landscape as well as habitats and to the wellbeing of communities and challenges a number of matters in sections 6 and 7 of the RMA.

16. However the recommended wording "*Avoid the spread of wilding exotic vegetation to protect nature conservation values*", only seeks to avoid the spread to protect nature conservation values.
17. This objective would not apply to avoiding the spread of wilding exotic vegetation for other purposes. As the NZ Wilding Conifer Management Strategy states; '*In the wrong place wilding conifers compete with native vegetation, change existing ecosystems, reduce available grazing land, limit future land use options, visually change landscapes, can affect surface flows and aquifer recharge in water sensitive catchments, and can result in damaging wild fires.*
18. We agree the out come sought is to avoid the spread of wilding exotic vegetation, however we consider that the reason to do this being *to protect nature conservation values* is too narrow, and may have unintended consequences. This also conflicts with the purpose and Objective 34.2 in Chapter 34 - Wilding Exotic Trees.
19. We agree the spread of wilding exotic vegetation is a significant issue in the sustainable management of the district and is thus appropriate to address in the Chapter on strategic directions. In fact we congratulate the council on giving prominence to the issue of wildings in the proposed plan. However we strongly oppose narrowing the purpose of control to nature conservation values.

#### **Policy 3.2.4.4.1**

*That the planting of exotic vegetation with the potential to spread and naturalise is banned*

20. Forest and Bird agrees with The Report's recommended amendment to prohibit the planting of identified exotic vegetation with the potential to spread and naturalise. This will rely on correctly identifying the species. Forest and Bird recommended adding some species in our submission to Rule 34.4.1, e.g. Buddleja, Grey and Crack willow, Rowan tree and Cotoneaster.

#### **New Goal, Objectives and Policies by Power Net**

21. Forest and Bird opposes Power Net's submission seeking a new goal, objective and suite of policies regarding provision for ongoing operation and growth of regionally significant infrastructure.
22. We note that the Report has not recommended including these and we support that. The proposed new provisions are in fine detail and covered in Chapters 27 and 30. The Strategic Direction chapter focuses on the District's special qualities.