

# Summary Submission on Vegetation Clearance

## Introduction

The Lakes LandCare Group consists of farming families from around The Upper Clutha District. Many families have been farming for up to 5 generations and manage a significant area. The group was established in 1992 in order to develop sustainable land management practices and deal with issues that affect farming within the community.

## Chapter 2 Definitions

### Clearance of vegetation

‘The deliberate application of water where it would change the ecological conditions that the resident indigenous plants are killed by competitive exclusion.’

- We oppose this definition. We understand this term ‘application of water’ to mean ‘Irrigation’, which is a normal expected farming activity. It is very important in this district due to our dry climate. It would be unreasonable for the QLDC to interfere with water issues that the ORC control.

### Clearance of vegetation

The submission from DOC (373) for proposing the inclusion of the term ‘Oversewing’ as a vegetation clearance definition.

- We oppose this definition, because this is also another normal expected farming activity that farmers use to improve pasture species on their land.

## Chapter 3 Strategic Direction

May I remind the hearing that there is strong recognition of the objectives in this chapter supporting farming activities in the district.

Here are two examples of normal legitimate farm activities trying to be captured or included as restricted activities in this process, which will cause conflict for farmers.

## Chapter 33 Indigenous Vegetation and Biodiversity

### Ref 33.5

- Rules - Standards for Permitted Activities for clearance of indigenous vegetation not located within a significant natural area or Alpine Environment.

### Rule 33.5.3

‘Land identified by LENZ at Level 1V is defined as having less than 20% indigenous vegetation remaining.’

Tim Burdon 791/794/1347.

- We Strongly oppose the inclusion of this untested criteria to be used as a new standard.
- The reason is the LENZ classification system covers the lowland/valley floor areas which are the same areas farmers are looking to improve farm production through land development, by vegetation clearance, cultivation and irrigation expansion.  
Presently you need an ecology report supporting any vegetation clearance that is able to be peer reviewed before a resource consent is granted.  
The LENZ criteria is not accurate and the maps are not up to date, which doesn't reflect the true vegetation assessment, and shouldn't be relied upon. This adds another unnecessary layer of restriction to the process.

#### Rule 33.5.6

'No clearance of a threatened species plant listed in section 33.7',  
which there are many included.

- We oppose in part the interpretation of this rule.
- We understand this to mean that one threatened plant can prevent vegetation clearance occurring. One plant does not constitute a high level of significance on it's own or whether it is adequate for protection when assessing a site. You would expect a significant community of a threatened species to be present to achieve this.
- This will cause considerable problems for farmers wanting to develop their land in the future, if this rule is not changed to keep things in context.