

Submission on QLDC Proposed District Plan

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District plan unclear. Judicial instruction to simplify and clarify.

Role of Government to for the people. Equitable Balance competing demand of special interest groups.

The proposed amendments to the QLDC district plan do not do this.

Re: drafting of the same concepts. It will fail. Further legal challenges.

Three fundamental flaws

1. Using surrogate indices rather than actual determinants. LENZ
2. Inadequate definition of Indigenous vegetation
3. Failure to consider adequacy of protection.

1. Value Determination

Vegetation clearance assessment determination of value must be done on the primary basis of the characteristics of the actual vegetation.

Naturalness : Structure (height tiers)
 Dominance (cover)
 Composition (vascular species)

Need all three together. Delete "OR".

Use of this rather than proscription. e.g. centre pivot evaluated on the vegetation under them, rather than simply a vehicle for competitive exclusion.

2. Definition of Indigenous Vegetation

Three class partition simple, logical and easily understood.

Indigenous vegetation: Requires representative examples to protect biodiversity

Modified semi-natural: Protection of best examples, where not adequately protected

Introduced: Protection of single species.

3. Adequacy of protection

Vegetation subject to clearance must be evaluated against what is already protected on the basis of actual vegetation or species information.

Only if it is not adequately protected does it require further protection.

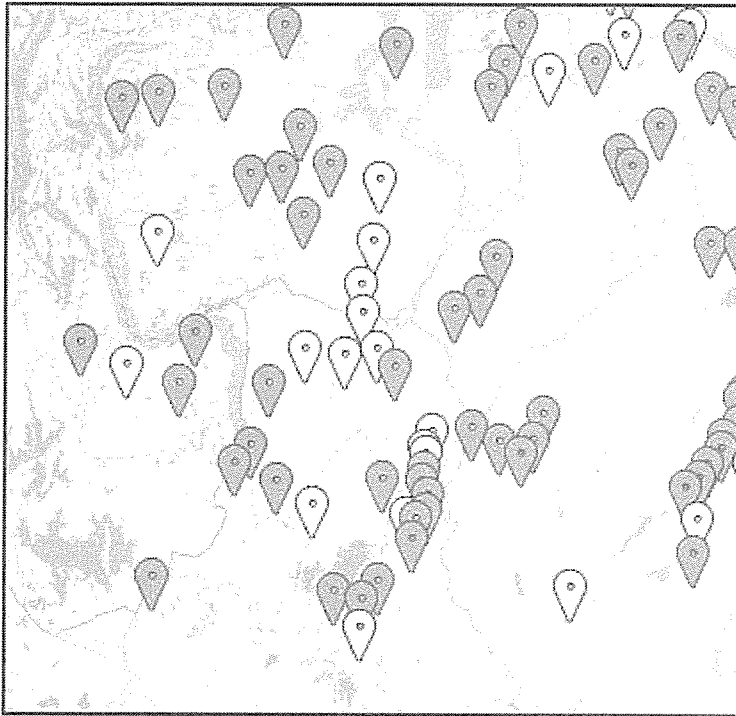
Essential to determine land use & priority for protection.

My evidence two clearance cases.

Large areas already protected or identified for protection under PNA survey and DOC Tenure review survey (Below map).



Process ongoing. Tenure review still incomplete and further areas will be added.



LINZ Crown Land tenure review.

The most important indigenous vegetation communities have already been identified and protected.

Further protection assessed against this baseline. Critical omission in QLDC plan.

Single or rare species. Assessed by professionals. Pictures & distribution maps on Website. Onus for identification and evaluation on public conservation agencies, not landholders.

Private land conservation. Participatory model vs. imposed regulatory.

ORC code of burning compliance.

QEII model.

A successful model.

Provides a workable path forward.