

DDPR_feedback_0104s		
	Name	Ben Douglas
	Organisation	Dome Hills
	Email	████████████████████
	Response Date	Aug 31 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
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Q10	Feedback/Comments	
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Q12	If you need more space, or have any other general comments, please leave them here	
	Please find attached feedback on the district plan review please -- Ben Douglas Dome Hills ██████████	

Waitaki District Plan Vegetation Classification Revision

Vegetation classification is important in relation to land use in the Waitaki District Plan. Regulations differ for indigenous and introduced vegetation. However indigenous and introduced species intergrade in many communities, making classification problematic (Figure 1).

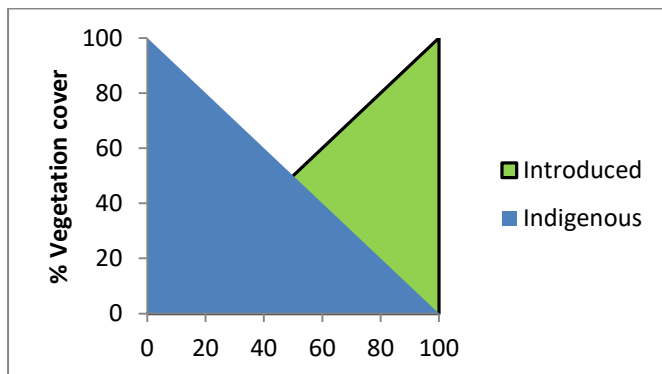


Figure 1. Relationship between introduced and indigenous vegetation cover.

The simplest logical classification involves a two way split, based on the midpoint. For example, using ground cover as the determinant, 50% cover would be the classification threshold. This has the advantage of simplicity but the resulting classes are too broad to be useful in practice.

The next simplest is a three way classification. Here the thresholds are ~33% and 66% (Figure 2).

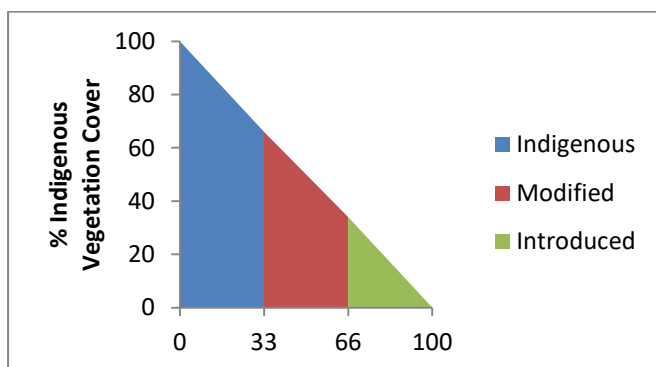


Figure 2. Three class vegetation classification.

Using this guide vegetation classes would be defined as:

Indigenous Vegetation: Means a plant community where species native to New Zealand dominate and comprise in total between 66% to 100% ground cover.

Mixed Vegetation: Means a plant community comprised of species native to, or introduced into, New Zealand where their combined cover comprises between 33% to 66% ground cover.

Introduced Vegetation: Means a plant community where species introduced into New Zealand dominate and comprise in total between 66% to 100% ground cover.

Note that this definition focuses on vegetation cover which is the most widely used attribute in ecology for community classification. Using this it is intuitively obvious that native beech forest or unmodified tussock grassland comprise indigenous vegetation or that pasture under a centre pivot is introduced vegetation.

Further 4 or 5 way classifications are possible but are more complex. A 3 class classification is simple and the most useful for policy and management.

Other vegetation attributes such as species composition and structure can be included to refine classification.

The Waitaki District Plan definition of indigenous vegetation is: *Indigenous vegetation 'means a plant community in which species indigenous to that part of New Zealand are important in terms of coverage, structure and/or species diversity. For these purposes, coverage by indigenous species or number of indigenous species shall exceed 30% of the total area or total number of species present, where structural dominance is not attained. Where structural dominance occurs (that is indigenous species are in the tallest stratum and are visually conspicuous) coverage by indigenous species shall exceed 20% of the total area'*¹.

Here the District Plan cover % threshold value for classification as indigenous vegetation is far lower than three way classification limits. A community with 70% introduced cover is therefore classified as indigenous vegetation (Figure 3). This is anomalous.

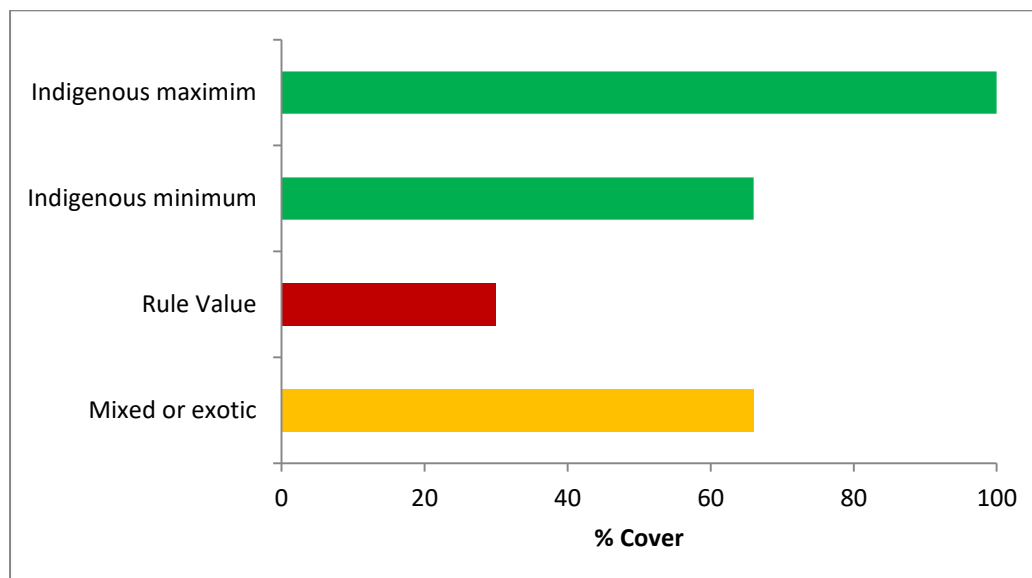


Figure 3. District Plan vegetation % cover threshold criterion in relation to three class classification thresholds.

¹ Waitaki District Council District Plan, Part III Zone Rules, p159.

The following criterion '*... where structural dominance occurs (that is indigenous species are in the tallest stratum and are visually conspicuous) coverage by indigenous species shall exceed 20% of the total area*' conflicts with the first criterion, where 30 % cover is used '*where structural dominance is not attained*'.

It is an error to assert that the cover where structural dominance occurs is less than the cover where structural dominance does not occur. Under this criterion vegetation with 80% mixed or introduced vegetation cover is anomalously classified as indigenous vegetation.

Here the District Plan is attempting to address a genuine issue in vegetation classification: ground cover operates in two dimensions, vegetation structure, incorporating height, occurs in three dimensions. Ecologists commonly use vertical classes, tier heights, to include this complexity in vegetation description. A frequently used way to integrate this information is to describe vegetation cover in each tier and then produce an aggregate index, for example average or aggregate cover across tiers.

The final criterion, where the '*... number of indigenous species shall exceed 30% ... of the total number of species present*' is similarly far lower than the 66% threshold derived from a three way classification.

There is a further problem. This criterion can conflict with the structural dominance /cover criteria if it is applied independently (Table 1).

Table 1. Application of District Plan Vegetation Classification Criteria

Criterion	Indigenous	Introduced
Non Dominant Cover < 30%		Yes
Dominant Cover < 20%		Yes
Species Composition > 30%	Yes	

In community ecology it is almost universal that a few species comprise the greatest biomass with a long tail of minor species, which can be visualised like an inverted hockey stick. Thus a vegetation community that has structural dominance from introduced species, for example improved pasture or shelter belts where a single of a few introduced species comprise the predominant cover but with low species diversity, could be classified as indigenous vegetation, if they contain a very low number of indigenous species.

This criterion, applied alone, can directly lead to incorrect classification.

Which of the criteria should take precedence if there is a conflict is unresolved in the District Plan.

There are further issues in the District Plan requiring examination regarding determination of 'Significant Indigenous Vegetation'. By definition there is indigenous vegetation that is non-significant².

1. Extent of Existing Protection.

Currently there is no formal provision in the district plan requiring evaluation of the adequacy of existing protection of a vegetation community in the district.

This particularly applies to high country properties that have completed Tenure Review. Council should consider using the data-sets that have been produced under Tenure Review as a starting point for evaluating proposals that may affect indigenous vegetation. Properties that have been through Tenure Review have been subject to rigorous assessments. Areas of significant inherent value (including biodiversity, ecology, landscape, and conservation) have been identified and either returned to the Crown/ DOC or protected through conservation covenants. The explicit understanding in Tenure Review was that resulting freehold land should be available for pastoral farming.

2. Improved and Semi-improved Grassland

Improved pasture is defined in the Waitaki District Plan as:

'3. For the purposes of Rule 4.4.8, improved pasture means an area of pasture where species composition and growth has clearly been modified and enhanced for livestock grazing by cultivation with or without associated burning, or by topdressing and over-sowing with or without associated burning, or by direct drilling, and where exotic improved pasture species dominate (i.e. where either the coverage of indigenous species or the number of species present, as estimated on a per hectare basis, does not exceed 30%. Improved pasture includes species such as ryegrass and clovers but excludes sweet vernal and browntop'

In the Draft National Policy Statement on Indigenous Biodiversity 3.12 (5) improved pasture is defined as:

'Improved pasture means an area of land where exotic pasture species have been deliberately sown or maintained for the purpose of pasture production, and species composition and growth has been modified and is being managed, for livestock grazing'

² Resource Management Act 1991. Part 2 Section 6 (c)

This definition includes as improved pasture vegetation where low-fertility tolerant pasture species such as browntop and sweet vernal grasses and clovers '*were deliberately sown or maintained ... for livestock grazing*'. This occurred under early European settlement, and has subsequently been maintained, but is excluded under the District Plan. As these species, together with other introduced species, are widespread in the Waitaki district and frequently are the dominants in extensive communities, the District plan need to either be amended to include them under improved pasture or to create a new category of Semi-Improved Pasture.

3. Incorrect Designation of Significant Natural Areas.

An ecological assessment for plantation forestry on Glenbrook Station evaluated a proposed new Significant Natural Area on the block and found the ecological evidence used to support this designation was incorrectly used and the designation invalid³. This raises a question regarding the adequacy other proposed new Significant Natural Areas in the District Plan. They require re-evaluation.

4. Incorrect Assessment of Vegetation Clearance.

The assessment of tussock burning as vegetation clearance in the District Plan is quite simply incorrect.

Clearance of canopy cover is not vegetation clearance any more than mowing a lawn or a deciduous tree shedding its leaves is not clearance as the plants are not killed. While tussock burning followed by close grazing can kill snow tussock, this is prohibited under the District Plan, so will not occur.

Summary

It is evident the current Waitaki District Plan has serious deficiencies regarding indigenous vegetation policies and rules. For widespread community acceptance and implementation they need to be revised.

We suggest adoption of a three way classification that clearly and simply classifies plant communities according to scientific rather than what appears to be arbitrary selection of thresholds⁴. This will form the basis for a genuine partnership approach with landholders that will both protect significant values and promote community and ecological wellbeing. Biodiversity conservation is one, but not the only, factor that requires evaluation in balanced land use. For example, the role of forestry in carbon capture and ecosystem

³ Espie, P.R. 2021. Glenbrook Ohau River Block Ecological Assessment August 2021. AgScience Contract Report.

⁴ This also applies to the allowed vegetation clearance areas which are entirely arbitrary and not related to management area.

resilience is a land use that has positive benefits, but will alter the vegetation community. There is considerable scope for careful assessment of mixed-vegetation communities that will allow beneficial development without adverse biodiversity outcomes achieving the fundamental goal of achieving the greatest public good.

DDPR_feedback_0187s	
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Organisation	Dome Hills
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WDC district plan change feedback

2nd August 2022

1. Forestry has been defined as either Carbon forestry or Plantation forestry.

Plantation forestry has been defined as that which "has been planted and has or will be harvested or replanted". Therefore a forest planted under the government's averaging regime (whereby an exotic tree is planted, carbon is earned and sold for 17 years in the ETS, then at the completion of the first rotation at say year 25 the timber is harvested without a carbon liability being incurred provided the trees are replanted), should therefore be deemed a plantation forest. In other words, a forest that will be harvested in the future should be deemed a Plantation forest even if it earns carbon credits in the meanwhile.

2. Carbon forestry is a controlled activity and a consent will be required for any planting that is not native.

It isn't fair that corporate carbon farms who perform whole farm conversions to carbon forestry are treated the same as an owner-occupied farm who wishes to strategically plant a small portion of their farm in carbon forestry. For example, a farm might seek to plant 5% of its land area in 10 strategic sites that do not negatively impact its local economy, environment, or pastoral productivity. Council has reacted to the negative publicity it received over NZ Carbon Farming's whole farm conversions, and in the process working farms are being penalised for a fundamentally different activity with fundamentally different consequences on the district. Surely selective carbon forestry (not whole farm conversions) should be allowed provided it meets the rules outlined in GRUZ-R15 p.537. That way protections can be kept without restricting the way farmers can strategically farm their own land.

3. Fencing in an Outstanding Natural Landscape and Rural Scenic Landscape.

Rules FL-R3 and NFL-R4.

In NFL-R3 the draft plan permits a farmer to establish a post and wire sheep fence in an Outstanding Natural Landscape and Rural Scenic Landscape, which is good. However the following rule (NFL-R4) only allows earthworks for the maintenance of existing tracks and fences, not the establishment of new fences that is so essential to successful farming in the high country. Given that this proposed plan increases the proportion of both the Outstanding Natural Landscapes and Rural Scenic Landscapes on farms, the inability to bulldoze a new fence-line in areas that have been farmed this way for over a hundred years is a reduction of existing land use rights and a restriction of farming activities in the high country.

It should be pointed out that in most cases in the high country (where many scenic overlays will be) to establish a fence you first need to bulldoze a line so a fence can be created. It is not the same as establishing a fence on a flat

paddock that doesn't require a bulldozed line. Said bulldozing fades back to obscurity as tussock and grass regrows in any case. There could be conditions that would need to be met, rather than carte blanche 'no'.

4. Clearance of native vegetation.

As pastoral farmers in the high country, the burning of tussock is central to our survival. If improved pastures cannot be maintained, then the portion of improved pasture (grasses & clover etc) within each tussocky hill block reduces over time to the point where it becomes uneconomic to farm there.

ECO-R1 on p.290 deals with this. Surely the draft plan should allow for maintenance burning of improved pasture? Unfortunately the proposed plan says a restricted discretionary consent will likely be required for any tussock burn. In this case, the listed matters of discretion on p.290 and 291 do not accommodate the maintenance of pasture / pastoral farming / economic consequences / existing land use rights. It feels like ECO-R1 has been written to protect native trees and bush, but with no protection of or allowance for farming practices. There should be matters of discretion that specifically address the needs of farmland so balanced view can be taken in the restricted discretionary process.

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Ben Douglas
Dome Hills

