

Notes for QE2 Submission to TCDC District Plan Review

- Good Afternoon, and thank you to Council and the Commissioners for the opportunity to discuss the QE2 National Trust's views on the Proposed District Plan
- QE2 National Trust specialises in helping landowners protect natural, historic, and archaeological values on private land.
- The Trust now has over 4000 covenants nationally, with 140 on the Coromandel
- Our submission doesn't focus on clauses in the proposed Plan, but on the broad sections and context of the Plan.

Background: LENZ and the Threatened Environments Classification

The NZ Biodiversity Strategy, DOC's Natural Heritage Management System, QE2's own land protection priorities, and the biodiversity protection strategies guiding regional and local government, are based on the Land Environments of New Zealand (LENZ) system.

- LENZ classifies New Zealand's terrestrial environments, using fifteen underlying climate, landform, and soil variables to measure the relationship between the environment and species distributions.
- LENZ uses these factors to define a landscape classification that groups sites with similar environmental conditions, and hence similar groups of species and similar biological interactions and processes.
- A major advantage is the prediction of the potential character of sites where natural ecosystems have been substantially modified
- The factors that control the distributions of terrestrial species are also factors that provide major constraints on human land uses such as agriculture, horticulture, viticulture, and forestry.
- The Threatened Environment Classification partners with LENZ, providing information on how much indigenous vegetation remains within LENZ's land environments; its legal protection status; and how past vegetation loss and legal protection are distributed.
- The Classification focuses attention on areas in which the least indigenous vegetation remains, and/or only small proportions are legally protected.
- It estimates the relative vulnerability of indigenous biodiversity to pressures such as land clearance, extractive land uses, and the effects of fragmentation.
- The Classification is applied to help identify places that are priorities for formal protection, and for ecological restoration to restore lost species, linkages and buffers.

Section 7-10:

On the Coromandel, most of the National Priority 1 Land Environments (as described in Section 4 and 5 of our submission) are on private land. Around a third of the Coromandel is public conservation land managed by DOC, but that leads to an expectation that "we're alright Jack" in terms of protecting natural values. However, most of this is the higher altitude forest of the Coromandel Ranges, which is very well represented here and nationally. This leaves little of the most threatened Land Environments either remaining or protected.

This presents a clear and present opportunity for TCDC and QE2 National Trust to partner in working with landowners and developers to protect a representative range of these "Acutely"

and “Chronically” Threatened Environments, while at the same time promoting economic use of their land.

We agree that District Council Plans are the best placed mechanism to achieve the National Priority Outcomes in the NZBS. However, although Significant Natural Areas in District Plans are a good tool for identifying and highlighting significant areas, development of that land is bound within a narrow and rigid framework.

Sections 11-13:

The proposed District Plan essentially repeats the subdivision model in the current Plan, which prioritises the protection of existing natural values within the property being subdivided. This can have the perverse and unintended consequence of causing a permanent pattern of fragmentation, and sometimes disturbing and disrupting the ecosystems and threatened species that the Plan aims to protect

The existing rules in the Plan are quite rigid, and we think there could be significant gains through being able to plan land developments without the necessity of being so rigidly constrained. Incorporating flexibility to allow developers, ecologists, and planners to work collaboratively could add value to both the development, and the protection of natural values. Some of the most innovative outcomes for land development and natural values protection have come through subdivisions that have required plan changes, or been non-complying, where developers, well advised by good planners and ecologists, have been able to be creative.

More house sites in a development do not necessarily mean losses in natural values. A formulaic approach to subdivision is not the only, or necessarily the best, way to get gains for economic development and natural values. In my opinion the biggest issue with subdivision is innovation in design. If developers are overly constrained in the approach they can take to subdividing land, that limits the levels of thought and innovation that can be applied to getting the best economic development and natural values outcomes.

Sections 14-17

At a national level the Trust has considerable experience with subdivision-generated covenants. We’ve become wary of involvement in subdivisions where Council policy limits good covenant and subdivision design parameters. The best opportunity for excellent covenants comes from District Plan policy which targets the most valuable existing or potentially restorable natural features, such as those highlighted through the LENZ system. Where the most threatened and least protected Land Environments are a priority in a District Plan, and where there are development incentives suitably weighted toward protecting priority natural features, QE2 has seen significant gains.

Although they are not yet part of mainstream planning and policy, Transferrable Development Rights and Biodiversity Off-setting offer some strong tools. In fact Transferable Development Rights are already being practised under the current TCDC District Plan.

- Take for example a property that has 2 titles, A and B.
- Someone proposes a subdivision using the extent of the subdivision rights of both titles.

- If title A has the natural feature, and B has the housing sites, then this is effectively a Transferrable Development Right.

That the two titles are separated by 1 other title, 100m, or 10km, makes no difference if the person proposing the development owns both. It could be good practise to constrain the distance by ensuring the areas are within the same Council Ward or Ecological District, or ideally within the same LENZ classification. As an ecologist I could probably justify it within the Coromandel Ecological Region. From a planning perspective I suspect it could be justified by the identified areas for development in the District, or the Preferred Future in the Coromandel Blueprint.

That said, there will be landowners with properties that have natural values that don't fit into the NZBS priorities. So there could be a set of baselines that all development needs to meet, while at the same time allowing flexibility for creativity and innovation. Or economic development incentives could be used to encourage appropriate development, for example planting native species for future harvest, something I will discuss in a few minutes.

Sections 18-23:

Our submission proposes a MOU between TCDC and QE2. There is a movement nationally away from "boxed conservation" toward the integration of all land uses on a property, including biodiversity protection as a land use in itself. QE2 Openspace covenants incorporate a wide variety of economic and other uses, and are closely monitored to ensure the principles in the covenant are upheld.

The combination of economic use of land and protective covenants occurs right across the country, and is best demonstrated at Coromandel's Driving Creek Railway. Barry Brickell has led this business to become one of the Coromandel's premier tourist attractions, helping establish a strong economic base for Coromandel town, and the wider Coromandel tourism industry.

What many people don't realise is that most of this property, including the majority of the Railway, is covered by a QE2 National Trust covenant. The covenant encourages the economic use of the land, while protecting nationally significant biodiversity values. These include populations of threatened species such as Brown Teal, North Island Brown Kiwi, and Coromandel Striped Gecko.

The Wardle covenant in Central Otago is an area of Beech Forest. When the covenant was established 30 years ago, a proportion was planted for future harvest and economic return. This is another example of QE2 National Trust covenants strongly supporting landowners achieving their economic and biodiversity protection aspirations.

Read through Summary, Sections 24-26

