

Stratford District Council  
Resource Management Act 1991

Submission on Stratford District Plan Variation 1 – Indigenous Forest &  
Biodiversity

To Stratford District Council  
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Forest & Bird wishes to congratulate Stratford DC with the District Variation 1 – Indigenous Forest & Biodiversity, as an approach to sustainably manage the district's indigenous forest, other indigenous habitat and the rich and diverse biodiversity, and prevent the destruction of significant natural habitat in the Stratford District.

Forest & Bird supports many aspects of District Plan Variation 1, with the exception of some (mostly minor) suggested adjustments as shown below.

Under Section 6c of the RMA Council has the statutory duty to provide for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance. Although Forest & Bird accepts that it is difficult to provide for a complete list of "Wetlands & Significant Habitats of Indigenous Fauna" I believe that the sites listed in Appendix 9 give a poor reflection of the important indigenous habitats in the District. Especially as it contains almost no important habitats of kiwi, robin, falcon and other threatened fauna and flora on private lands. Forest & Bird sees it as an important role of Stratford District Council, with input from Department of Conservation and Taranaki Regional Council,, to have up to date detailed information about the location of significant indigenous natural habitat in the district.

The plan change suggests under A2.4.4 "to encourage landowners...to voluntarily protect areas of indigenous vegetation and significant habitats of indigenous fauna ...". But there is no mention of how Council will achieve such encouragement or what will be put in place to achieve this. A number of other District Councils (sometimes combined with neighbouring Councils) have appointed a full or part-time biodiversity officer whose role it is to encourage and inform private landholders to protect and manage natural habitat and biodiversity. This could be a useful option for Stratford DC.

The same comment can be made regarding the proposed “monitoring of indigenous vegetation areas”: who will carry such monitoring out and how (A2.4.7)?

I seek the following decision from Council:

- That Policy A2.3.2 be re-worded as follows:

*To protect areas of significant indigenous vegetation, ~~and to protect areas of~~ including all indigenous forest remnants on the ring plain*

- That Method A2.4.3 be amended as follows:

*To maintain a schedule within the District Plan of the location, significance and area of all areas of significant indigenous vegetation and significant habitats of indigenous fauna identified in the District.*

And add:

A2.4.3A From time to time, Council will undertake Plan Changes to include areas that have been identified as significant within the meaning of section 6(c) of the Act as “Protected Areas” within the District Plan.

- That the word “mahhi” in B1.2.1.1d be spelled correctly as “maahi”.

- That B1.2.1.3.1g be changed from:

The findings of an ecological assessment of the subject area

to:

Effects (of indigenous forestry) on the protection of significant indigenous vegetation and fauna habitats of the subject area

- That in B6.1.2. “involve” is changed to “include”:

*An ecological assessment....., which shall include consideration of any or all following*

- That in B6.1.2 “indigenous” or “threatened” is added to:
  - *The quality of the vegetation or the habitat for indigenous species;*
  - *The diversity and abundance of indigenous species....;*
  - *Whether the habitat or area contains nationally threatened species...*
- That the Title of the proposed Appendix 9: Wetlands and Significant Habitats of Indigenous Fauna be amended as follows:

*Appendix 9: Wetlands, areas of significant indigenous vegetation and Significant Habitats of Indigenous Fauna*

- That a note be added to Appendix 9 as follows:

This list is not comprehensive. As additional Wetlands, Areas of Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna sites are identified, they will be included in this table on a regular basis through the Plan Change process.

I do wish to be heard in support of my submission. If others (e.g. DOC) make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

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Signature

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