

Further Submission on Proposed Variation 1 – Stratford District Plan

(Closing date: 4.30 pm, Friday 5 November 2010)

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NZ Forest Managers Ltd wishes to be heard in support of its submission.

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Date: 4 November 2010

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Submitter	Submission Number	Variation Reference	Support/ Oppose	Reason
Taranaki Regional Council	10/01-06	Appendix 9	Oppose	Appendix 9 contains wetlands and habitats of indigenous fauna within the District that have been identified as significant. Adding further sites to Appendix 9 is unnecessary as if wetlands and habitats are not currently identified as significant then they are not deemed to be significant by Council, i.e. they do not meet the significance criteria. Appendix 9 adequately captures areas of significance in Proposed Variation 1 and undertaking an exercise to capture further sites is unnecessary.
Ngati Ruanui Group Management Ltd	10/03-23	B1.2.1.1	Oppose	Amending the permitted activity rule by deleting the ability to disturb vegetation under 3m in height is overly burdensome and does not allow for the 'normal' functioning of many rural land uses. The permitted activity rule needs to have some thresholds and NZFM considers the 3m height threshold appropriate.
	10/03-25	B1.2.1.4	Oppose	NZFM consider that a limited discretionary status is more appropriate than full discretionary, as per the NZFM submission 10/15-137.
Department of Conservation	10/05-31	Part E	Support in part	NZFM agrees that the proposals are unclear as to who may carry out an ecological assessment. This issue needs to be clarified by Council. NZFM does not support the Council maintaining a list of qualified ecologists, as suggested by the submitter, as if a 3 rd party assessment is required the ecologist employed may depend on many factors, such as the land ownership. There needs to be some degree of flexibility for land owners/managers to employ their choice of ecologist, rather than having a select list to choose from.
	10/05-37	A2.4	Oppose	It is not necessary for Proposed Variation 1 to contain a method for the regular review of Appendix 9. To update Appendix 9 once Variation 1 is adopted would incur a substantial cost due to requiring a Plan Change. This is unnecessary. Ensuring that areas of significance are captured in Appendix 9 in Proposed Variation 1 will negate the need for unnecessary future Plan Changes, which are costly to ratepayers. Appendix 9 can be updated during District Plan reviews and this level of review and potential amendment is adequate.
	10/05-49	Appendix 9	Oppose	See comments above for 10/05-37
Royal Forest & Bird Protection Society of NZ	10/07-55	A2.3	Oppose	NZFM opposes a regular review of Appendix 9 due to the unnecessary cost this places on ratepayers in the District. Areas of significance have been effectively captured in Proposed Variation 1 and Appendix 9 should only be updated in the future during the review of the District Plan.

	10/07-59	B6.1.2	Support	The amendment proposed by the submitter would provide greater clarity to the proposed provisions.
	10/07-61	Appendix 9	Oppose	See comments above for 10/07-55
Iain & Katherine Sextus	10/09-69	A2.4.5	Support in Part	NZFM supports the intention of this submission point. Rates relief should be considered for landowners who have land identified within Appendix 9, given that these areas are regulated in Proposed Variation 1.
Federated Farmers of NZ	10/10-73	Part E	Oppose in Part	<p>Including a percentage in the definition of 'Indigenous Vegetation' would add clarity to the definition; however NZFM is opposed to '<i>species growing as a result of human actions</i>' being excluded from the definition.</p> <p>This exclusion is too vague and offers nothing of substance to the definition of 'Indigenous Vegetation', rather it would exclude a large amount of indigenous vegetation from the definition. There would be only a very small amount of vegetation within the District that has not been affected by human actions in some way.</p> <p>A species is either exotic or indigenous and the 'Indigenous Vegetation' definition needs to remain simple for it to be effective.</p>
	10/10-74	Part E	Oppose	<p>NZFM opposes the requested exemptions to the definition of 'Indigenous Vegetation Disturbance' on the basis that they would undermine the definition.</p> <p>The current exclusion (b) is sufficient for allowing maintenance of lawfully established infrastructure, including roads, culverts etc and there appears no reason to differentiate between infrastructure on farms and infrastructure elsewhere within the District.</p>
	10/10-75	General	Support	A significance test would be useful to determine whether an ecological assessment of an area is required or not – as per NZFM's submission point 10/15-140.
	10/10-101	B1.2.1.1	Oppose	See comment above for 10/10-74.
	10/10-106	B1.2.1.1	Oppose in Part	<p>The construction of new farm tracks should not be a permitted activity if it requires the disturbance and clearance of indigenous vegetation. Such a rule would undermine the intentions of Proposed Variation 1, i.e. to effectively manage indigenous vegetation within the District.</p> <p>If Council decides to allow for the construction of tracks as a permitted activity, this</p>

				should be a District-wide provision for all tracks and not specific for farm tracks only.
Ministry of Agriculture & Forestry	10/13-124	Part E	Support	Introducing an area threshold within the 'Indigenous Vegetation Disturbance' definition would reduce the financial cost for landowners and better reflect the actual effects of activities.
	10/13-127	A2.4.2	Support	As per NZFM's submission point 10/15-139 and 140
Genesis Energy	10/16-142	B1.2.1.4	Support in Part	NZFM agrees that an area threshold would be beneficial to allow reasonable use of land as an alternative to the proposed non-complying rules. To enable the practical use of land however, the threshold should be 1000m ² rather than the 500m ² suggested by the submitter.