

# TE RUNANGA O NGATI RUANUI TRUST

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5 November 2010

Mike Avery  
Stratford District Council  
PO Box 320  
**STRATFORD**

Tena koe Mike

**Re: Variation 1 – Proposed Stratford District Plan Indigenous Vegetation and Biodiversity**

Thank you for providing the submissions which have been made on the above Plan Change.

Ngaati Ruanui makes the following further submissions:

- 1. Submitter: Taranaki Regional Council**  
The relief sought for appendix nine is supported (10/01-06). In particular Ngaati Ruanui considers it essential that the Stratford District Council does not rely on the surveys conducted by the Regional Councils alone.
- 2. Submitter: Department of Conservation**  
The submission lodged by the Department of Conservation is generally supported. In particular the relief sought to appendix nine and the need to clarify the policy about the ring plain. (10/05-34, 10/05-48 and 10/05-49)
- 3. Submitter: Royal Forest & Bird Protection Society of NZ**  
The relief sought regarding the policy for the ring plain to provide greater clarity in approach is supported (10/07-53).  
The relief sought in respect of appendix nine (10/07-54, 10/07-55, 10/07-60, 10/07-61) is supported.
- 4. Submitter: Federated Farmers of NZ**  
The intent of the submitter to seek clarity around interpretation and defined thresholds is acknowledged. However, the relief being sought to include new permitted activities allows for a great deal of interpretation, and therefore potentially reduces certainty about what would require a resource consent and what would be a permitted activity. The changes sought require greater linkage across the proposed objectives, policies

and rules than the relief being sought. Without a greater degree of sophistication and understanding of the relief being sought the submission is generally opposed.

The commentary and interpretation of Section 6 of the Resource Management Act is in particular opposed. While Section six requires the recognition of matters of national significance this does not limit the discretion of a local authority to consider other matters of importance to an area or community. The contents of a District Plan are not constrained by Section Six of the Act. The ability to consider specific important district and regional environments at a local planning level sits at the heart of the Resource Management Act.

The submitter seeks to introduce the ability to clear regenerating native vegetation through a number of submitted changes, this is opposed. (10/10-87 to 10/10-119) Regeneration of native vegetation is an important element to overall biodiversity and cannot be overlooked. Regenerating vegetation enables new habitats to be created and will often ensure the further security of native fauna such as a kiwi.

**5. Submitter: Ministry of Agriculture and Forestry**

Allowing limited harvesting of indigenous forestry without the need for an ecological assessment is opposed. (10/13-124) A robust assessment for any harvesting is required as part of a robust assessment for a resource consent, this will enable biodiversity values to be protected and a fulsome process followed.

Allowing as a permitted activity harvesting of indigenous timber simply because it is administered by the ministry is opposed. The Plan change as drafted allows for a transparent process to occur, in most cases, through a resource consent process; this should be maintained. (10/13-126)

The relief sought for Appendix 9 to include significant indigenous vegetation is supported. (10/13-128)

**6. Submitter: NZ Forest Managers Ltd**

Amending the 20 metre buffer distance from wetlands to 5 metres is opposed. A 20 metre strip is a common distance used to achieve protection of waterways and wetlands and is widely accepted. The resource consent process is available to reduce the buffer distance where this is considered more suitable for a particular site. (10/15-140)

**7. Submitter: Genesis Energy**

The proposed 500 metre square area trigger to distinguish between discretionary and non-complying activities is opposed. The non-complying activity status as expressed in the draft plan change is supported, area triggers are too arbitrary and adds to the complexity of the Plan change. (10/16-142, 10/16-143 and 10/16-144)

Ngaati Ruanui does wish to be heard in support of this further submission in conjunction with our submission on the draft plan change.

Please contact our Environmental Unit should you wish to discuss this submission further.

Ngā mihi,

**Ngapari Nui**  
Tumuwhakaae

A handwritten signature in blue ink, appearing to be 'N. Nui', is written below the typed name.