7th June 2011

Ministry for the Environment
PO Box 10-362
Wellington 6143

Dear Sir/Madam

COMMENTS OF THE THAMES-COROMANDEL DISTRICT COUNCIL ON THE REVISED NATIONAL ENVIRONMENTAL STANDARD FOR PLANTATION FORESTRY DOCUMENT.

The Thames-Coromandel District Council (TCDC) welcomes the opportunity to provide further comments upon the revised proposed National Environmental Standard for Plantation Forestry. As stated in its original submission on the discussion documents, TCDC supports in principle the development and adoption of an NES for plantation forestry. The Council recognises the benefits to the industry resulting from a consistent resource management framework for managing forestry activities, particularly where these cross local and regional council boundaries.

Overall it appears that the revised document and suggested changes improve the proposed NES and address some of the issues raised in our original comments. There are, however, some areas where we still believe improvements could be made.

With regards to the erosion susceptibility classification maps, TCDC has some concerns regarding how users will be able to accurately determine which classification a property or area falls within if the maps are not validated below 1: 50 000, as stated on the MFE website. In addition, the term 'earthflow country areas' is used throughout the information booklet on the revised policy and is also defined in the definitions. However, we were unable to find any reference to how these areas will be identified and by whom.

TCDCs concerns remain regarding cost recovery for permitted activities which require monitoring. There is little point in requiring auditing reports be provided to District and Regional Councils if these are not monitored to some degree to ensure the information they provide is accurate. This is a cost that should be borne by the forestry company rather than the district ratepayers (if a resource consent is required monitoring costs are able to be recovered by way of the consent conditions). The discussion of comments received to the proposed NES discussion document does not appear to address this issue.

TCDC are still also very concerned with respect to the impact the proposed NES may have on the permitted baseline tests. It appears from the discussion of issues raised in the first round of comments that this issue has not been resolved and in fact has been placed in the 'too hard basket'. As stated in our previous comments, the implications of the proposed NES on the permitted baseline test could be far reaching and have unintended (and unwanted) consequences.

TCDC supports the more standardised approach regarding instances where District Plans are able to be more stringent than the proposed NES, particularly in relation to outstanding natural features and landscapes, significant natural areas and regionally significant water bodies. However, we previously raised the possibility of more stringent rules applying in areas of high natural character as well as outstanding landscapes and this does not appear to have been considered or mentioned in the revised document, except as subset of outstanding natural features and landscape.
We note that Section 6 (a) of the Resource Management Act 1991 (RMA) includes the preservation of the natural character of the coastal environment, and lakes and rivers and their margins as a matter of national importance and that Policy 13 of the New Zealand Coastal Policy Statement 2010 requires the preservation of the natural character of the coastal environment. Production Forestry in the Thames-Coromandel District often occurs in the vicinity of streams and rivers which have been identified as having high natural character and may also occur in the coastal environment. For these reasons we consider it necessary that areas identified as having high natural character values are also able to have more stringent rules for forestry - particularly in relation to setbacks from stream/rivers.

TCDC supports the removal of reference to 'rural zone' and instead the reliance on the four erosion susceptibility classes (outside of urban areas). This removes our concern regarding how 'rural zone' would be interpreted. Our other concerns regarding the coastal zone would be further allayed if the ability to apply more stringent rules for activities were applied to areas of high natural character as well as outstanding natural landscapes and features, as this would include the most sensitive parts of the District's Coastal Zone.

Our final comment relates to the issue of setbacks and their impacts in relation to the New Zealand Emissions Trading Scheme (ETS) and the two options discussed in Appendix 5. It is the Council's strongly held view that setbacks should not be relaxed for reasons relating to potential liability for deforestation under the ETS. Therefore, our preference is for option one. Setbacks are required to protect water bodies and the financial consequences of this should not be of greater concern than the potential environmental and local financial impacts (e.g. on catchment management initiatives, Council infrastructure etc). In this regard TCDC believes existing forests should not be allowed less onerous water body setbacks for replanting.

If you have any further queries please do not hesitate to contact me.

Yours sincerely

Steve Ruru
Chief Executive

Leigh Robcke
District Plan Manager