

ORAL SUBMISSION ON PROPOSED THAMES-COROMANDEL DISTRICT PLAN

To: Thames-Coromandel District Council

Submission on: Proposed Thames-Coromandel District Plan

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INTRODUCTION

My name is Alan Fleming. I am the Central North Island Regional Conservation & Volunteer Manager for the Royal Forest & Bird Protection Society. I hold a Bachelor of Social Sciences from Waikato University majoring in Geography and a Certificate of Marine Studies from the Bay of Plenty Polytechnic. I have worked in Conservation Management for the past 20 years.

This oral submission relates to some of the matters as identified in Forest & Bird's submission dated 14 March 2014 in particular some of the outcomes and relief specified in Annexure 1 of that submission.

Forest & Birds submission focuses on:

- Indigenous Biodiversity
- Land Use and Water Quality
- Forestry in the Thames Coromandel District
- Forestry Activities in Rural Zone
- The Coastal Environment
- Mining Activities

Section 6 – Biodiversity

The protection, maintenance and enhancement of biodiversity and ecosystem function do not enjoy sufficient priority in the Proposed Thames Coromandel District Plan (PTCDP). **A separate issue should be added to acknowledge this and elements related to it reallocated further through the document.**

Forest & Bird also wish to ensure the PTCDP gives effect to sections 6(a) and (c), and 31(1)(b)(iii) of the RMA, policy 11 of the NZCPS on protecting indigenous biological diversity in the coastal environment, and sections 7 and 8 of the Hauraki Gulf Marine Park Act 2000 (HGMPA 2000).

A biodiversity net gain approach should be applied across the district, on both a project by project basis and overall for biodiversity (significant and otherwise).

Relief sought

- Re-word the existing objectives to priorities the protection of significant indigenous vegetation and significant habitats of indigenous fauna (matters of national importance) over the use and development matters that are currently enabled by the objectives.
- Include an objective of recognising and providing for the protection of significant indigenous vegetation and significant habitat of indigenous fauna.
- Include an objective of providing for the protection and, where appropriate, the enhancement of the life-supporting capacity of the environment of the Hauraki Gulf catchments.
- Include a definition of sustainable use.
- Add a new issue which acknowledges the threats to biodiversity and need for action.

- Add a new objective requiring protection of significant indigenous vegetation and significant habitat of indigenous fauna.
- Add a new objective seeking to achieve a net biodiversity gain across the Thames-Coromandel District.
- Amend the policies to require adherence to the mitigation hierarchy.
- Amend the policies to provide clear direction on the implementation of biodiversity offsetting, including the articulation of principles of offsetting.
- Provide additional non-regulatory methods.
- Amend the PTCDP to provide for additions to the SNA layer over time.
- Add regional objectives and policies relating to SNAs.
- Amend the rules to provide a greater level of protection for SNAs.
- Add rule that indigenous vegetation clearance, land disturbance and land drainage within a Significant Natural Area is a non-complying activity.
- Add objectives and associated policies, methods, rules and performance standards that give effect to sustainably managing the use and development of rural land, and of discharges of contaminants.
- Amend the PTCDP to ensure a greater focus is placed on enhancement and restoration of biodiversity across the District.
- Amend the rules relating to vegetation clearance in the Coastal Environment so that where Policy 11 NZCPS would apply vegetation clearance is prohibited (where adverse effects are significant) or a non-complying activity.

Land Use and water quality

There is no dedicated discussion on land management practises that have adverse effects on water quality yet these issues are pressing environment concerns for many residents of the Thames-Coromandel District and must be addressed to achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources of the district.

Relief sought:

- Articulate the land use and management issues that are adversely effecting water within the Thames Coromandel District, including the effects that production forestry and farming have on water bodies;
- Include a discussion identifying Council's intentions regarding the integrated management of land use effects on the natural character of water bodies and their margins; and;
- Acknowledge the necessity for a close working relationship with the adjoining territorial authorities and Waikato Regional Council to address water quality and land management issues, including with regard to the Hauraki Gulf.
- Include policies and rules which give effect to integrated management of land use and water quality, e.g. exclusion of stock from wetlands and lakes and rivers and their margins.

Forestry in the Thames Coromandel District

Production forestry and associated management practises in the Thames-Coromandel district are of great concern to Forest & Bird. Weathered volcanic soils, steep terrain and frequent high intensity rainfall events result in adverse effects to the environment include loss of biodiversity and high levels of sedimentation to fresh waterways and the coastal environment.

Relief sought:

- Generate maps that identify erosion susceptibility
- Include provisions / rules for controlling forestry which reflect erosion susceptibility.

Add the following method:

Assess the current level of uptake and compliance to the range of compulsory and voluntary forestry standards within the Thames Coromandel District and ensure that all forestry companies / contractors are adhering to the required standards.

Standards should include:

- Forestry Stewardship Council membership.
- Other industry, standards NZ or international standards.
- Accredited forestry operators compliance to:
 - *New Zealand Environmental Code of Practice for Plantation Forestry (Cop)*
 - *New Zealand Forest Code of Practice (LIRO 1990, revised 1993)*
- And WRC documents:
 - Design Guidelines for Earthworks, Tracking and Crossings: A Practitioner's Technical Guide to Minor Effects Based Activities
 - Erosion and Sediment Control: Guidelines for Soil Disturbing Activities
 - Erosion and Sediment Control Plan Preparation Guidelines

Forestry Activities in Rural Zone

Relief sought:

Forest Activities in the Rural Zone

Harvesting

All harvesting will comply with all Forestry standards associated with the harvesting of plantation forests.

Tree Planting

The Council shall restrict the exercise of its discretion in relation to these matters to the effect on riparian, landscape, natural features and nature conservation values, including the siting, design, the restriction of tree species and management of the tree planting and mechanisms to prevent wilding spread.

Add the following definition of forestry to the plan.

Forestry - means the management of land for commercial wood production, inclusive of all phases of the production cycle including ground and or vegetation clearance for access and planting, planting (and re-planting), thinning, spraying, pruning and maintenance, felling and the extraction of timber from the site. Forestry includes any quarrying or gravel extraction activities on the site associated with private access road formation, any traffic movements associated with the production cycle, and forestry-related scientific or research activities.

The term forestry also includes any planting and management of trees for water and soil conservation, carbon sequestration, shelter belts, and farm-forestry activities that are not necessarily commercial-scale wood production.

For the purposes of this plan the term forestry excludes associated processing activities such as sawmills, pulp and paper production and other wood processing facilities, except for the operation of mobile sawmill facilities on a site for no longer than 3 months in any 12-month period.

Section 7 – Coastal Environment

Relief sought:

- Include an additional sub-objective of providing for the protection and, where appropriate, the enhancement of the life-supporting capacity of the coastal environment.
- Identify additional SNA's in coastal marine areas.
- Strengthen provisions and rules which address sedimentation.
- Prohibit new development in areas subject to coastal hazards including sea level rise.
- Ensure any residual adverse effects of coastal / marine activities are offset to achieve a net gain.

Section 9 - Landscape and Natural Character

Forest & Bird will comment on the Natural Character provisions when a variation to the PTCDP is notified later in the year

Section 14 – Mining Activities

Relief sought:

- Include a statement to the effect that pursuant to Schedule 4 of the Crown Minerals Act TCDC support no mining on **all Crown conservation land north of the Kopu-Hikuai Road and the foreshore on the Coromandel Peninsula (and most adjacent offshore islands and Hauraki Gulf islands).**
- Table 1 - 37.4 - Other mining activities. Amend as shown in table below

Table 1 - Activity Status of Mineral Processing, Quarrying, Surface mining, Underground mining and Waste rock/tailings storage

Zone	Mineral processing	Quarrying	Surface mining	Underground mining	Waste rock/tailings storage
Rural	Non-complying	Restricted discretionary	Discretionary Non-complying	Discretionary Non-complying	Non-complying
Rural Lifestyle					
Industrial	Discretionary	Restricted discretionary	Prohibited	Discretionary	Non-complying
Light Industrial	Discretionary	Restricted discretionary			Prohibited
Marine Service	Non-complying	Non-complying			
Airfield	Non-complying	Non-complying	Non-complying	Discretionary	Prohibited
Road					
Commercial	Prohibited	Prohibited	Prohibited	Prohibited	Prohibited
Gateway					
Pedestrian Core					
Conservation	Non-complying Prohibited	Discretionary Prohibited	Non-complying Prohibited	Discretionary Prohibited	Prohibited
Open Space	Prohibited	Non-complying	Prohibited	Non-complying	
Recreation Active					
Recreation Passive					
Coastal Living	Non-complying Prohibited	Non-complying Prohibited	Prohibited	Discretionary Prohibited	Prohibited
Extra Density Residential	Prohibited	Prohibited		Prohibited	
Low Density Residential				Non-complying	
Residential					

Village	Prohibited	Prohibited	Prohibited	Non-complying	Prohibited
Waterfront					

- That TCDC create a rule that any mining activity above prospecting level (permitted activity) should ensure full public notification under s77D(a)1.

SUBMISSION ENDS.

