



Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

Full Name:	Ronald Toni Wooldridge		
Company / Organisation Name: (if applicable)			
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1. Submitter details:

2. (Please select one of the two options below)

I **could not** gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission, please complete point 3 below

3. I **am** directly affected by an effect of the subject matter of the submission that:

(A) Adversely affects the environment; and

(B) Does not relate to trade competition or the effect of trade competition

I **am not** directly affected by an effect of the subject matter of the submission that:

(A) Adversely affects the environment; and

(B) Does not relate to trade competition or the effect of trade competition

Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991



Confirm your position: Support Support In-part Oppose <i>(please tick relevant box)</i>			
My submission is: <i>(Include details and reasons for your position)</i> see doc FNDC/SNA plan 2022			
<i>Include Waiaruhe forest remnants on 6969 SH1-</i>			
<i>Include SNA FN594 subject to 6969 SH1 also being identified as SNA</i>			
<i>Reject SNA FNxxx (teumutakiura) inclusion</i>			
<i>Make provision for the Public Purse to pay for public good. (if relevant)</i>			
<i>Reject on principle any administrative charges being levied upon landowners in relation to SNA inclusion. (if relevant)</i>			

2.

Important information:

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

Send your submission to:

Post to: Proposed District Plan
Strategic Planning and Policy, Far North District Council
Far North District Council,
Private Bag 752
KAIKOHE 0400

Email to: pdp@fndc.govt.nz

Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.

Submissions close 5pm, 21 October 2022

Please refer to pdp.fndc.govt.nz for further information and updates.

Please note that original documents will not be returned. Please retain copies for your file.



Note to person making submission

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

SUBMISSION NUMBER

SNA FN594 Waiaruhe Bush remnants.

Submission to FNDC Proposed District Plan 14 October 2022

Apology

I have no easy familiarity with this technology, I apologise it is not compiled in some easy to read form. I am unable to number the pages. FNDC has in-house Appendix referenced documents needing to be accessed,

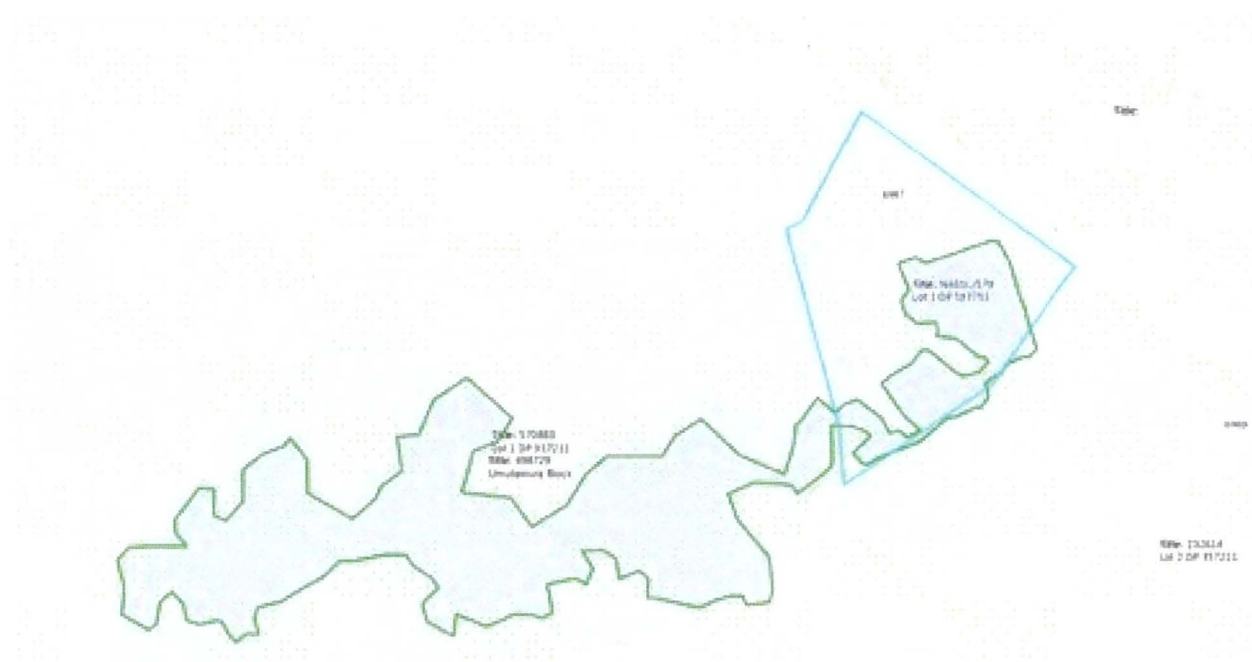
Introduction.

My relationship with this whenua began in July 1999 when I bought this property of 6987 SH1. The threat as assessed by consultants was real, very long term unrestricted stock access in all three areas, old trees and a visible history of collapse. Extensive invasive species replacing indigenous forest grazed bare of seedlings, grazed every time stock accessed, 4 or so times a year. No saplings, every tree mature or ageing. Nothing survived within the reach of grazing cattle. Stock damage, widespread threatening consequences to exposed roots. Of the 27 acre Urupa, it had been divided into 4 fenced paddocks including a bulldozered access track, and piped trough water. Landlocked, the landowner adjacent effectively converted the area to his own use.

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FIG 1

- **(The Urupa-) Te Umu Takiura. identified**
- **6987 SH 1 - identified. (FN594)**
- **6969 SH 1 -not identified-adjacent to the south east**



I was supportive of Oromāhoe Trust in their efforts to fence the Urupa. I have an informal whāngai kaitiaki role through whānau relationships. As a consequence, I have become familiar with aspects of the ecology, pre and post grazing and the multiple threats these forest remnants are now facing.

The 1857 Survey plan. Fig 6 page 10 ref. below (Appendix)

Remnants within Teumutakiura have been fenced and stock free circa 2012. Existing forest outline remarkably similar to 1857 Survey relevant to 6969

These remnants mostly have a protection through their presence within the Heritage precinct. Now overlaid through SNA identification. It is also a gazetted Maori reserve, an Urupa. Unlike tau Iwi, ie especially those whose viewpoints and philosophies dominate our society, maori hold their wāhi tapu as sacred, while tau iwi are comfortable exhuming graveyards and construct motorways through them. Grafton gully an example. In my opinion the SNA designation placed

by desk bound consultants over the urupa Teumutakiura is a gross insulting over-reach made through ignorance on their part of the land transaction which identified the purpose of that identified location for all time. A sacred place. The ignorance of the location and purpose of this tapu whenua on the part of FNDC reflects a dismal lack of knowledge through supporting that over-reach. FNDC support is an insult to Maori tikanga, mana whenua and the SNA designation must be removed.

S440.001

Given the areas' history, it is reasonable to assume the forest floor has been grazed since cattle were introduced sometime in the later 1830s concurrent with Henry Williams efforts to get his model farm established. That helps provide something of a time line. There is an ageing male kahikatea in progressive decline including characteristic wind throw. J.T. Salmon's 'The Native Trees of New Zealand' suggest its' age is approximately 500 years. The location is known for titoki. What remains are of much the same age. The timeline suggests about 230 years, suffering collapse and surprisingly, occasional resurrection. Until the closing of the remnants forest floor to livestock, I saw no juvenile titoki.

The forest remnants within 6969 SH1 remain grazed, by their spacing probably selectively logged. I was unable to obtain any response from Emily Robinson, FNDC staffer, despite sending her two letters addressing SNA, in the course of 2021. The trees have no Heritage Precinct protection. Nor are they included in an SNA. These are primarily mature kahikatea with a distinctive and within these remnants, unique ecology habitat generated through their rooting behaviour in now drained shrinking wetland and should be included in an SNA. My perception is the identifying consultants failed to recognise the history and relevance of these trees to the forest remnants as a whole, finding it conveniently easy to provide demarkation using property boundaries, and ignoring the significant and important part this remnant contributes to both the forest and the Heritage Precinct.

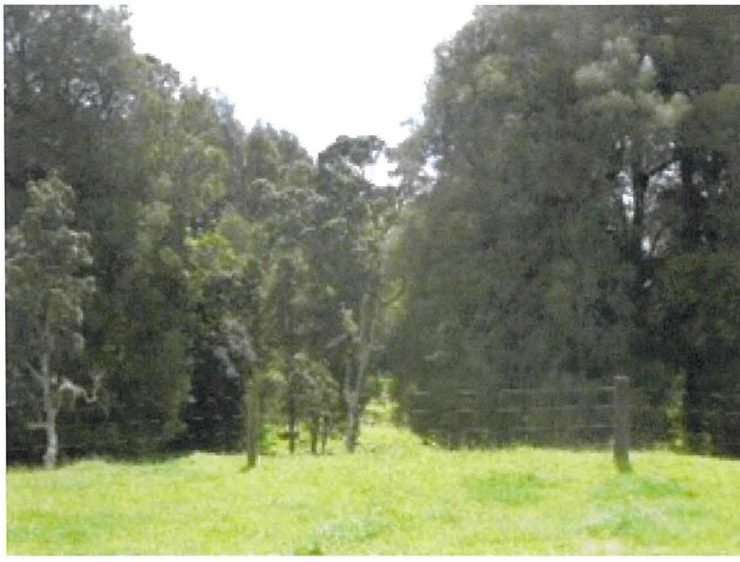


Fig 2 Forest remnants 6969 SH 1

The question arises as to what is the difference between these remnants. Apart from an absence of forest floor, there is none.

S440.002

These 6969 forest remnants should be allocated the same protected status as that within the SNA identified areas. Historically, dramatically and significantly they are part of the sum of the whole, including contributing to the Heritage Precinct, with significant ecological and amenity value. If the fact they have no forest floor is relevant to their non-selection, then for consistency it is relevant to all SNA areas with no forest floor. It may be that contributing to their SNA non-selection is the convenient existence of a property boundary, which includes most but not all of the historical extent of the original forest area.



This suggests one important criterium has been to use property boundaries for demarkation purposes. This view contributes to the idea that despite all the associations this historical forest remnant has with the associated adjacent forest remnants it is part of, these kahikatea and puketea meeting Wildlands all 4 criteria and justifications of FN594, inexplicably the same criteria and justifications do not apply to these 6969 SH 1 Waiaruhe forest remnants.

Photo Left showing L -6969 6987 R SNA FN594

- There is an overwhelming presence of well established fast moving invasive species in this long settled area, in these Waiaruhe forest remnants, and in every suitable position where stock have not access, roadsides, hedges, copses, domestic gardens, fence lines, anywhere that is in the care of nature.

Above 6969 Waiaruhe forest remnants.



PAGE.
2 views of
6969 SH1
Waiaruhe
Forest
Remnant

THE INVASIVE SPECIES THREAT.

Present and very well established, dominating in Waiaruhe Forest remnants and in the immediate vicinity are:

Chinese privet
Japanese privet
Japanese Honeysuckle
Jasmine
Moth plant
Ivy
Taiwan Cherry
Pampas grass
Gorse
Tobacco weed
Greater bindweed
Periwinkle
2 x Eucalyptus species

There may be more.

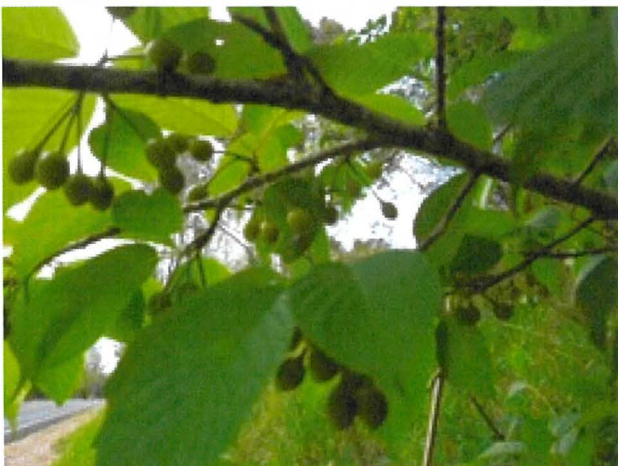
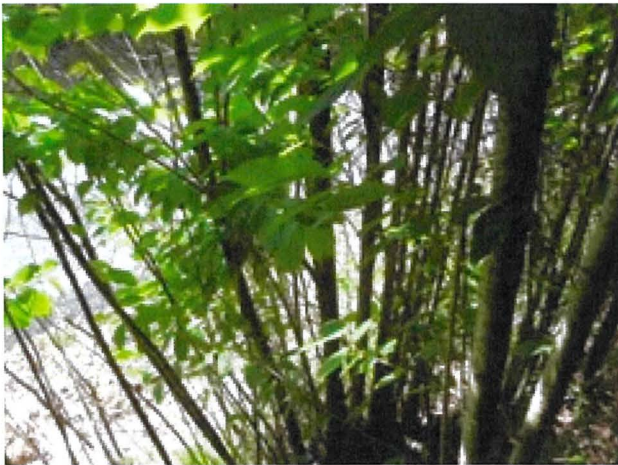
- Weed species are mostly kept under control on farms, with least management and interference, by livestock, but only as high as the stock can browse
- Grazing of the forest floor destroys indigenous biodiversity, the opposite of SNA function.
- The fencing of the urupa in C 2012 has hastened manifestation of very aggressive fast spreading threats from widespread noxious/invasive species with spectrums of dominating characteristics
- Because of the effects of long term grazing, mature trees of any particular dry-land species, are at least 230 years old.

Taiwan cherry, estimated 500 fruiting plants. SH 1 Pakaraka



- As ageing trees, they are more vulnerable.
- Within the last 5 or 6 years, multiple copses of mature karaka collapsed through fast acting very intensive beetle predation.
- Wind throw and collapse of ageing trees is widespread
- Such opened areas are very quickly colonised by invasive species, spread to everywhere a bird excretes or the wind blows.
- Some weed species are identified botanically as promiscuous, seed to seedling within 6 months, becoming ubiquitous.

Roadside cherry, coppice,

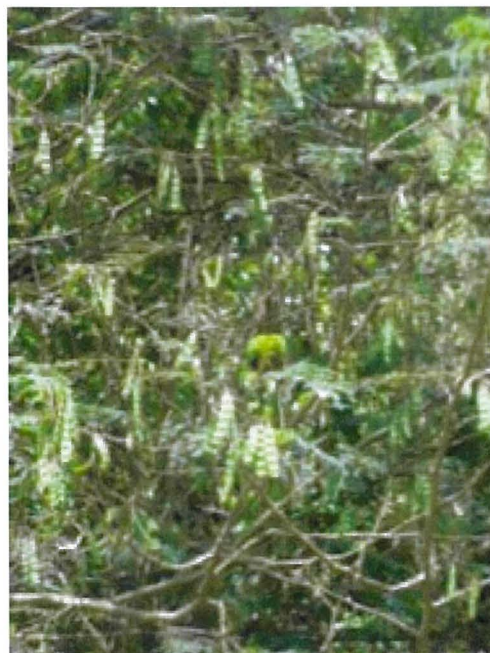
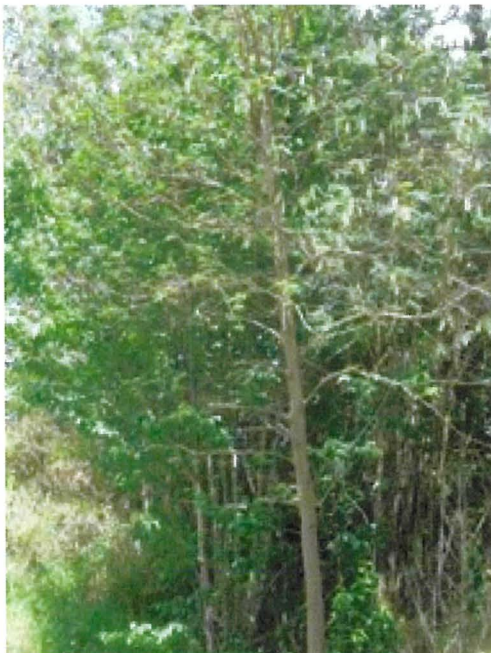




Above: Roadside cherry and tobacco bush



Below: Roadside seeding Eucalyptus



Umutakiura boundary/ 6969 SH1
Pakaraka - Invasive species



What has been revealing since the fencing of Teumutakiura since circa 2012 has been the change in the vegetation. Previously the well established native trees were relatively widespread with an open forest floor, a smattering of kawakawa, a variety of small ferns well established in a rocky and transit difficult lava flow landscape. The forest floor revealed a history of fallen trees, wind throw, age, victims of storms, insect predation, stock damage. They lay in the landscape sometimes barely a linear hump of decomposing organic material almost unrecognisable as once being a tree. There was also regular shambolic and impassable tangles of broken branches, evidence from the most recent storm, adjacent trees revealing damage from the falling. Dislodged epiphytes, leaf clusters attached to twigs, small branches. Foot traffic visibility of 40 metres. Quite open, blocked occasionally by clusters of gorse, see through thickets of tobacco weed. It was easy to navigate, clear to view the death throes of more massive trees, puriri, as well as titoki, rewarewa, karaka, an occasional taraire remaining standing. As the forest trees collapsed, privet, tobacco weed, gorse, ragwort, moved into the vacant spaces. Nothing consistent, no stiff carpets of dry-land forest tree leaves, no rich moist leaf mulch waiting for kiwi. No fresh seedlings, cattle tracks through clustered perimeters of thickly packed old man gorse, no spindly saplings with out-of-cattle-reach clusters of shiny green leaves. A lot of light, only semi-shade, a crumpling of ivy, carpet-like at the base of a substantial old man puriri, more than head high as it sent tendrils obscuring the web covered macarua holes in the wood. An older isolated tree cloaked in moth plant, fruit dangling in multitudes.

The last time I entered Teumutakiura, perhaps 4 years ago, the situation had changed. Then, two much larger invasions of ivy, quite spreading in area maybe 200 m² each. The entry point into the forest led into a larger concave valley floor with a well established web of jasmine, relatively few leaves for the length of the shoots, vigorously extending itself in the moist semi shade as it headed along the valley or up onto sloping rising ground.

Now there are clusters of vigorously growing taiwan cherry, frequently a number of flowering trees, sometimes single, standouts of bright pink, bright leaf green easy to identify. I recall I counted 18.

The photos taken from the 6969 forest boundary tell their own story, densely impenetrable, climbing, seeding, spreading, fighting for space. With their presence, the authenticity of the indigenous habitat of flora and fauna is disappearing. Even with prodigious and expensive effort the battle is lost. Remove the plants, millions of seeds remain, spreading to everywhere a bird roosts, excretes, flies.

My experience in FN594 mirrors that which is happening in the urupa, the primary difference being I am present, do what I can to weed as I move around my property. After 6 months privet can be impossible to pull out, clusters of seedlings of 50, 100, the number of any occasion starts with one, but if I have the time, can easily count to more than 500. On one occasion more than 800. At this stage, taiwan cherry seedlings are in low figures, single figure digits, the crops from this year only now beginning to germinate. That number will only increase, as this year's crop, only just finishing, is spread by the thousands.

SUBMISSION

- Presented has been clear and logical justification for the application of SNA status to Waiaruhe forest remnants on 6969.
- In the absence of that status, I withdraw my agreement, identifying the inconsistencies inherent to the application of such status.
- I request the withdrawal of the imposition of SNA status upon Teumutakiura for reasons earlier identified.
- The SNA designation is imposed 'for public good'. "Consumer pays" is the capitalist principle invoked. In fairness and all reasonableness therefore, owners of SNA designated property must have rates relief or other appropriate funding of those SNA areas.

S440.003

Forest management.

- Actively ageing trees are present.
- Inevitable collapse, wind-throw, rot consequences, threats to built small infrastructure, lighting, dry stone walls, fencing in damage vulnerable fall zones and must be able to be pro-actively managed as required at no imposition of costs from either the State or FNDC
- There must be no costs associated with FNDC consents, consultations, inspections and other administrative impositions upon the property owner. S440.004
- It is appropriate to provide landowners with a list of associated FNDC empowerment and potential actions, consequences as a result of the SNA designation. S440.005
- The warning of weed threat to indigenous forest manifesting increasingly in the next 100 years, and its' potential to modify, change, destroy indigenous flora and fauna habitat, thereby voiding the Govt's administrative intent to conserve indigenous biodiversity through SNA status is, real and is already severely manifesting in especially Teumutakiura
- As a consequence it is important for empowered Authorities to research, initiate, fund weed control in SNA's and the greater environment which contain such weed sources. S440.006
- The situation is already dire.
- it is not a reasonable expectation that SNA designated property owners should fund, provide labour, chemicals, disposal of vegetation for weed control in SNAs.
- With the intent to create public good, costs, funding must lay with the imposing authorities.
- Of concern to me, is the increasing inability of an old man. As I age I will have less physical ability to effectively control or minimise any weed species threat, as well as an increasing inability to fund, undertake personally conservation efforts. If a positive outcome of conservation efforts is important to the State then it must be funded by the State. and/ or the local authority
- Failure to do so will imperil the success of the function of the SNA identification.

R T Wooldridge
6987 SH 1 Pakaraka

21/10/2022

APPENDIX.

REFERENCING :

FNDC Council files.

- Application for Non-Notified Resource Consent Reference number. BC_2017-1120/0
Containing:
Bell Heritage -A Report on the Archaeological Survey and Assessment of 6987 SH1

Pge 3 Fig 1. Aerial showing property boundaries of 6987 SH1

Fig 2. Enlarged view of Fig 1, showing 6987 SNA 594 forest relationship with property boundary of 6969 and the non SNA relationship

Pge 10 Fig 6. Survey Plan 1857 in the vicinity of the spring head Kahutoto locating existing forest remnants on 6969