

File ref: 3-OR-3-5

18 November 2022

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Kia Ora Jason

National direction for plantation and exotic carbon afforestation

Thank you for the opportunity to comment on this Discussion Paper.

Rangitikei District Council has focussed on Part B in that Paper. However, I have joined other Mayors around the country in discussing the submission developed by Lawrence Yule as a sector-wide commentary. The Council supports his position, especially the suggested amendment to the NES-PF to cover all forests (as noted below in the response to question B14).

Below is our response to Part B, following the questions posed in the Discussion Paper.

B1	Do you agree with the problem statement set out above? Y/N. Are there other things we should consider	Y. There needs to be an identifiable balance between the various issues. Are native forests to be considered to have different impacts?
B2	Have we accurately described the social, cultural and economic effects of plantation and exotic afforestation at a community level (Appendix D refers)? Y/N. What other social, cultural or economic effects should we be made aware of? Please provide evidence of the impact of these effects.	Y. One issue emerging with the sale of the 4800 ha Mangaohane Station is ensuring the continued maintenance of the rural water supply reticulation which runs through this property to others on the Erewhon scheme. In addition, there will be loss of staff from the Station with consequent impact on the local school's role and staffing, and the nearby marae. The sale of this large station is likely to be the first on many significant stations in the Rangitikei. Because afforestation is not counted as an improvement, the rateable value of a property converted to forestry is reduced. While Rangitikei is following the lead of some other councils in proposing a roading differential to address the high costs of maintaining roads during harvesting of the forest, this will be more complex in the case of carbon forests where harvesting is restricted during the first 50 years.

B3	Do you agree that the social, cultural and economic effects of plantation and exotic carbon forests should be managed through the resource management system. Y/N. Why?	Y. The resource management system the right place to manage environmental effects of afforestation and thus a secure basis for the initial management of social, cultural and economic effects. We would like to highlight the upcoming resource management reform, and suggest any changes take account of ensuring a smooth transition to the new system.
B4	What is your preferred option for managing the social, cultural and economic effects of plantation and exotic carbon afforestation? <i>Select from list. Option 1 (a local control approach), Option 2 (a consent requirement through national direction). No preference. I do not support wither of these options. Why?</i>	Option 2. National direction is required to reduce uncertainty and duplication. We support local control through consenting to be able to mange effects appropriately at a local level.
B5	How effective would Option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation) be in managing the social, cultural and economic effects of plantation and exotic carbon afforestation? <i>(Select from a range/scale not effective – highly effective) Why?</i>	Effective. It would allow these effects to be explored through a consultation process with the local communities within the region. However, there is a risk of lack of consistency.
B6	What impact would option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation) have on the rate and pattern of plantation and exotic carbona afforestation?	It would be likely to reduce the rate of plantation and exotic carbon afforestation on highly productive land currently used for pastoral or horticultural farming.
B7	What are the benefits of Option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation)?	It allows local communities, through their councils, to influence future use of highly productive land, with regard to how that influences community and business life as well as Māori concerns.
B8	What are the costs or limitation of Option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation)?	Council will incur costs through its plan development, consultation and engagement. One limitation is that communities may feel that the environmental effects outweigh the social, cultural and economic effects. Another limitation is that neighbouring councils may differ in how they regard the effects, so that there could be substantial opposition from property owners who wish to convert.
B9	If Option 1 (a local control approach to managing the location of plantation and exotic carbon	High priority. As previously noted, the potential conversion of the Mangaohane Station could have a flow-on effect to other farms in the northern

	<p>afforestation) is progressed, would making plan rules to manage the social, cultural and economic effects of plantation and carbon afforestation by controlling the location be a priority for your community or district. <i>Choose from a range Not a priority to high priority. Why?</i></p>	<p>Rangitikei. However, Council recognises that owners need to maximise their revenue streams so an early discussion with the community is imperative; Council also needs to be clear on the rating impacts of such conversions.</p>								
B10	<p>What implementation support would be needed for Option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation)?</p>	<p>Guidance to councils on how to weigh up the various factors such as type of land, scale of afforestation, type of afforestation (i.e. plantation, exotic, transitional), rating impact, infrastructure impacts (water races/rural water supply reticulation)</p> <p>We support the suggestion included in the sector submission prepared by Lawrence Yule for an immediate interim amendment to NES-PF to cover all forestry (i.e. to become NESF) and to distinguish consenting thresholds for different land use categories:</p> <table border="1" data-bbox="759 981 1388 2018"> <tr> <td data-bbox="759 981 991 1211">LUC 1-3</td> <td data-bbox="999 981 1388 1211"> <p>Non-complying activity status – allowing an application to be made accepting that it is against the plan and requires full public notification.</p> <p>Restricted discretionary status for native planting over 1 ha.</p> </td> </tr> <tr> <td data-bbox="759 1223 991 1597">LUC 4 and 5</td> <td data-bbox="999 1223 1388 1597"> <p>Permitted activity status for forestry that cumulatively occupies less than 100 ha or 10% of any title or group of titles operating as one farming business (whichever is the lesser);</p> <p>Discretionary status for areas greater than this, including whole farm conversions.</p> <p>Permitted activity status for native planting over 1 ha.</p> </td> </tr> <tr> <td data-bbox="759 1608 991 1921">LUC 6 and 7</td> <td data-bbox="999 1608 1388 1921"> <p>Permitted activity status for cumulative forestry up to 30% of any title or group of titles operating as one farming business</p> <p>Discretionary status for areas greater than this, including whole farm conversions.</p> <p>Permitted activity status for native planting over 1 ha.</p> </td> </tr> <tr> <td data-bbox="759 1933 991 2018">LUC 8</td> <td data-bbox="999 1933 1388 2018"> <p>The same for carbon as in the NES-PF for production forestry, i.e. controlled activity status if</p> </td> </tr> </table>	LUC 1-3	<p>Non-complying activity status – allowing an application to be made accepting that it is against the plan and requires full public notification.</p> <p>Restricted discretionary status for native planting over 1 ha.</p>	LUC 4 and 5	<p>Permitted activity status for forestry that cumulatively occupies less than 100 ha or 10% of any title or group of titles operating as one farming business (whichever is the lesser);</p> <p>Discretionary status for areas greater than this, including whole farm conversions.</p> <p>Permitted activity status for native planting over 1 ha.</p>	LUC 6 and 7	<p>Permitted activity status for cumulative forestry up to 30% of any title or group of titles operating as one farming business</p> <p>Discretionary status for areas greater than this, including whole farm conversions.</p> <p>Permitted activity status for native planting over 1 ha.</p>	LUC 8	<p>The same for carbon as in the NES-PF for production forestry, i.e. controlled activity status if</p>
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			less than 1 ha in any one year, restricted discretionary status if greater than 2 ha in any one year. Permitted activity status for native planting over 1 ha.
	<i>If option2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation) is further developed.....</i>		
B11	Are the variables outlined above (type of land, scale of afforestation, type of afforestation (i.e. plantation, exotic, transitional) the most important ones to consider? Y/N. What, if any, others should we consider?	Y. Impact on local council rates should be included too. The financial impact of increased maintenance of rural roads associated with an increase in forestry is an important consideration. Council should be able to charge financial contributions to address this matter.	
B12	Which afforestation proposals should require consent? (Please consider factors such as (type of land, scale of afforestation, type of afforestation (i.e. plantation, exotic, transitional)	Proposed use of land containing highly productive soils) Length of current use Proportion of property to be afforested Type of afforestation (should include indigenous)	
	<i>Based on your answers above</i>		
B13	How effective would Option 2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation) be in managing the social, cultural and economic effects of plantation and exotic carbon afforestation? (Select from a range/scale Not effective-highly effective) Why?	Effective. A national approach can provide the framework for national consistency, with the consenting frameworks to provide for local decision-making.	
B14	What impact would Option 2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation)? Please explain or provide evidence.	Because the NES-PF is a regulation, amending it can be done quickly (i.e. within the first two or three months of 2023). This will help avoid a spike occurring in afforestation, irrespective of local concerns about social, cultural and economic impacts.	
B15	What are the benefits of Option 2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation)?	It will ensure a consistent approach across the country, which is likely to facilitate afforestation and reduce costs for such proposals. Lower costs for individual councils.	
B16	What are the costs and limitations of Option 2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation)?	Councils will need clear guidance in administering such consents so that this is done on a consistent basis.	

B17	What are the most important and urgent social, cultural and economic effects of plantation and carbon afforestation that you would like to see managed under the resource management system? Where and at what scale do these effects need to be managed?	Proposed conversions of large farms (say, over 2,000 ha) currently containing highly productive soils and used for pastoral and/or horticultural farming. Housing needs consideration. Staff moving off afforested farms are likely to experience difficulty in finding homes in towns where there is already a lack of housing to buy or rent. Facilitation of re-locating farm cottages could be an option. Moawhango is one such case.
B18	Should this be done now under the RMA or later under the proposed National Planning Framework and NBA Plans? Why?	Now, under the RMA, to avoid a rush to afforestation before the proposed national Planning Framework and NBA Plans are in effect.
B19	Would standards in an amended NES-PF need the support of national policies and objectives? Y/N	Y. Any rules in a NES should be guided by an objective and policy framework.
B20	What implementation support would be needed for Option 2 (a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation)?	Similar to Option 1 (q. B10)

I hope these comments are helpful.

Ngā mihi



Andy Watson
Mayor of the Rangitikei District