

24 November 2018

Whangarei District Council  
Private Bag 9023  
Whangārei, 0148

Dear Sir/Madam

Director-General of Conservation Submission on Plan Change 129

Thank you for the opportunity to submit on Whangarei District Council's Plan Change 129 relating to Notable and Public Trees. We appreciate the opportunity to be heard and apologise we will be unable to attend the hearing in person.

The purpose of this letter is to provide further detail on the concerns raised in the Director-General of Conservation's (the Director-General) Submission on Plan Change 129, and to reiterate the importance of managing kauri dieback disease as a resource management issue to be addressed through the district plan.

On the 8th of June 2018 the Director-General submitted in opposition of the proposed plan change. The Director-General's submission requested amendments to Plan Change 129 objectives, policies and rules relating to notable and public trees to include consideration of kauri dieback disease for any land disturbance works near kauri. The reasons for the submission identified that kauri dieback disease is easily spread through soil movements, including when it is carried on footwear, equipment and vehicles. Any land disturbance works, including emergency and utility works, within three times the radius of the canopy of the dripline of a New Zealand Kauri Tree ("the kauri hygiene zone") can cause potential contamination of an uninfected site and spread the disease.

Since lodging this Submission there has also been further information to come out of an interim decision from Chief Judge Newhook for rules in Thames Coromandel District Plan which identified the significance and urgency of combatting the spread of kauri dieback disease through many management tools, including district plan mechanisms:

*"We agree with Mr Whaley, Dr van Eyndhoven, and others, that regulation in District Plans is not only desirable; it is necessary. We also accept that there can be no one silver bullet, but that various agencies must take steps within their respective areas of jurisdiction or influence." (Para 122, Newhook 2018)*

Proposed Plan Change 129 offers another mechanism for managing the spread of kauri dieback.

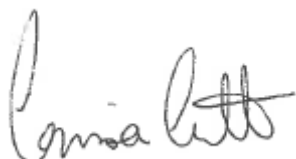
The Section 42A report agrees in principle that the issue of kauri dieback disease is a significant resource management issue and it is appropriate to consider how it is addressed in this plan

change. The reporting officer has recommended a number of changes based on the necessity of addressing the spread of kauri dieback disease using the notable and public trees mechanism.

The Director-General supports the recommendations from the reporting officer and does not oppose the adoption of this plan change if the recommendations proposed in the section 42A report relating to the management of kauri dieback are imposed.

Please contact Maggie Burns in the first instance if you wish to discuss any of the matters raised in this letter (0276322961, mburns@doc.govt.nz).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Louisa Gritt', written in a cursive style.

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Louisa Gritt

Operations Director

Whangarei