



# TAHEKE 8C

The Proprietors of Taheke 8C and Adjoining Blocks (Inc)  
*Toitu te whenua he oranga whakatupuranga*

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**To:** Ministry for the Environment  
PO Box 10362  
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The Proprietors of Taheke 8C & Adjoining Blocks (Inc) ("Taheke 8C") wishes to be heard in support of this submission.

## INTRODUCTION

1. The Proprietors of Taheke 8C and Adjoining Blocks (Inc) ("Taheke 8C") was incorporated in 1954 by Order of Incorporation issued by the Maori Land Court pursuant to Rule 81 of the Maori Land Act 1931.
2. Taheke 8C is located approximately 20-minutes north east of Rotorua State Highway 33. The area is known as Okere Falls and our lands lie adjacent to the Okere/Kaituna River. The total land administered by the incorporation is approximately 1193ha and the legal description is "The Proprietors of Taheke 8C & Adjoining Blocks (Inc)".
3. The incorporation maintains a register of shareholders names and their shares in accordance with the requirements of the Maori Land Court. There are currently 1066 shareholders holding 50,611 shares in total.

4. Up until 2007/2009, the activities on Taheke 8C land comprised sheep and beef farming and forestry (pre-1990). The incorporation had plans to expand its position in regard to its farming operation; however the impact of climate change legislation, 2-3 years of drought, and the property boom which led to an increase in lease rental rates together with the ongoing global financial crisis and recession resulted in changes to our farming operations. In addition to this change the committee discussed available options for alternate land use and development of the resources on and under Taheke 8C land. One such option is forestation. As tangata whenua, Taheke 8C places a large emphasis on the balance between protecting the environment and the ability to develop our resources for the benefit of our shareholders. Taheke 8C is therefore an important stakeholder as both tangata whenua and a potential owner of forestry.

5. The revised National Environmental Standards for Plantation Forestry (“**Revised NES**”) could therefore have a large impact on our ability to administer our land effectively and efficiently.

#### **Afforestation:**

1. Under the current Rotorua District Plan, plantation forestry is classified as a permitted activity. The proposed Rotorua District Plan, which is currently in a notification stage, also categorises plantation forestry as a permitted activity.

2. The Revised NES erosion susceptibility classification (“ESC”) maps currently categorise Taheke land as yellow and orange, with some small areas of red. The corresponding appendix recognises the Taheke land as having ESC values of High and Moderate. This categorisation will mean that afforestation on large tracts of Taheke land, which is a potentially significant area, will require a resource consent.

3. Requiring Taheke to obtain a resource consent under the Revised NES, where such a resource consent would not be required under the current and proposed district plan, would appear to be contrary to the NES objective of reducing unnecessary resource consents. Such unnecessary resource consents will deter afforestation.

#### **Heritage Values:**

1. One of the environmental outcomes in the Revised NES aims to achieve the protection of heritage sites, and areas of land (if any) surrounding such sites, as is reasonably necessary for the purpose of ensuring the protection and reasonable enjoyment of them, including prevention of activities that could destroy, damage or modify any part of any such site. Taheke, as tangata whenua, recognise the significance and importance of heritage and cultural values, however, this environmental outcome should not prevent landowners from developing their land.

2. Recently, increasing numbers of Maori landowners are choosing to develop their lands for the benefit of their iwi, hapu and whanau. Maori land inherently has many cultural and heritage values attached to it. However, as tangata whenua, Maori are best

placed to understand these sites and how to best manage the values, waahi tapu and taonga.

3. The Revised NES allows for the protection of cultural and heritage values including waahi tapu sites and sites of significance to Maori. However, the Revised NES also provides local and regional councils with the ability to be more stringent on cultural and heritage matters. While Taheke recognises the importance of the local and regional authorities, many councils either have no ability to protect these values or place too much emphasis on the protection of cultural values, at the expense of the landowners developing their resources. Therefore, the local and regional councils should not have the ability to make stringent policies and rules over cultural and heritage values on Maori land, when it is the Maori landowner that is best placed to protect their cultural sites, waahi tapu and taonga.

4. Preventing local and regional councils from having the ability to make stringent policies and rules over cultural and heritage values on Maori land, accords with the outcome statement of the Revised NES; to bring about the consistent and sustainable management of natural and physical resources, using good forestry management. If councils prevent Maori landowners from developing their resources, there cannot be a consistent and sustainable management of the natural and physical resources.

#### **Comments on the ROAR system:**

1. The intent of the Review of Authority Rules ("ROAR") is to determine the rules that currently exist for plantation forestry activities in the district and regional plans and compare these against the stringency of the policies in the Proposed and Revised NES. Taheke supports the intent of the ROAR and acknowledges the breadth of information that is contained within this analysis. However, after reviewing the ROAR, it has been difficult for Taheke to pinpoint some of the specific additional requirements that they may face under the Revised NES.

2. This has made it difficult for Taheke to assess the specific implications of the Revised NES and any additional requirements that they may be required to undertake in relation to their land. For example, and as explained in paragraph 5 above, the plantation of forestry including harvesting is a permitted activity under the Rotorua District Plan. However, afforestation in red or orange areas under the Revised NES is discretionary. This is not readily apparent from the ROAR.

#### **Summary:**

The above examples indicate that the Revised NES, in its present form, will limit the scope of the incorporation's involvement in the sustainable management of their taonga. The Revised NES is therefore unacceptable to Taheke in its current form. However, the suggested amendments, contained within this submission, will allow Taheke to effectively and efficiently participate in afforestation and allow Taheke to develop consistent and sustainable management of natural and physical resources.

**“Ānei ngā kōrero o ngā kaitiaki tuturu o te Taheke 8C tiakina te whenua tiakina hoki  
ngā rawa hei oranga mō te hunga e whai panga ana i tēnei whenua.”**



(Sandra Eru)  
General Manager