

Online Further Submission

Further Submitters Name Summit Forests New Zealand Limited

Further Submitter Number FS176

Further Submitter #176

Wish to be heard Yes

FS qualifier a person who has an interest in the proposal that is greater than the interest the general public has (e.g. land owner, resource user)

FS qualifier reason I am a person representing a relevant aspect of the public interest as a representative of an organisation (SFNZ) operating within the Far North District.

Joint presentation Yes

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Online further submitter? Yes

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Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
FS176.1	PF Olsen Limited	S91.002	General	General / Plan Content / Miscellaneous	Amend the application of objectives, policies and rules in the plan. As the plan is currently drafted there are no permanent exotic forestry/carbon farming appropriate controls in the plan as compared to plantation forestry.	Support	Allow	As described by the original submitter
FS176.2	NZ Agricultural Aviation	S182.009	Definitions	PLANTATION FORESTRY	Amend the definition of Plantation Forestry	Support	Allow	As set out in the original submission

	Association			ACTIVITY	Activity to include Agricultural Aviation Activities				
FS176.3	Manulife Forest Management (NZ) Ltd	S160.013		Natural Environment	SD-EP-O6	Amend SD-EP-06 to read as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected for current and future generations.	Support	Allow	As set out in the original submission
FS176.4	Manulife Forest Management (NZ) Ltd	S160.020		Natural character	NATC-R2	Amend NATC-R2 PER-1 to include plantation forestry tracks.	Support	Allow	As set out in the original submission
FS176.5	PF Olsen Limited	S91.016		Natural features and landscapes	Rules	Amend the rules for plantation forestry activities in the Natural Features and Landscapes overlays limiting to only apply to plantation forestry earthworks. Delete the irrelevant Matters of Discretion for earthworks in Natural Features and Landscapes overlays. Amend the rules to provide consistency of application for primary production activities.	Support	Allow	As set out in the original submission
FS176.6	Northland Regional Council	S359.039		General	General / Plan Content / Miscellaneous	Amend the Plan to consider including controls on exotic carbon forestry within the coastal environment, natural character areas, ONFL and areas of elite soils	Oppose	Disallow	The adverse effects being attributed to carbon forestry are equally attributable to other land uses that would not be subject to control.

					to protect the values of these resources and to manage nuisance such as shading, plant pest spread and fire risk.				
FS176.7	Nicole Wooster	S259.016		Coastal environment	CE-R6	Amend rule to consider whether only exotic trees should require resource consent.	Oppose	Disallow	While SFNZ supports the submitters point regarding the need for landuse flexibility, the submitter relief seeks to "pick winners" based on the provenance of vegetation rather than managing any adverse effects.
FS176.8	Northland Regional Council	S359.019		General	General / Plan Content / Miscellaneous	Amend to include stronger reverse sensitivity provisions. Provisions to consider requiring greater setbacks of potentially up to 100m for habitable buildings within production zones, appropriate visual and physical screening and limitations on intensity of noise sensitive activities	Support	Allow	Reverse sensitivity issues occur within and between zones where sensitive activities seek to establish in a productive landscape.
FS176.9	Director-General of Conservation (Department of Conservation)	S364.005		General	General / Plan Content / Miscellaneous	Amend the Plan to be consistent with the NPSIB exposure draft. Specifically, but not limited to: <ul style="list-style-type: none"> Protect SNAs and identified taonga on Māori lands inline with 	Oppose	Disallow	The DP needs to be consistent with the NPS-IB not the consultation document. The NPS-IB has been gazetted and took effect from 4 August.

clause 3.18 of
the NPSIB
exposure draft.

- Include objectives, policies, or methods in the PDP for managing the adverse effects of new subdivision, use, and development on highly mobile fauna areas.
 - Incorporate NPSIB Appendices 3 and 4 or like principles into the PDP. Update proposed Policy IB-P4 to require that any biodiversity offset, or biodiversity compensation be in accordance with these principles.
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FS176.10	Northland Federated Farmers of New Zealand	S421.001	General	General / Plan Content / Miscellaneous	Amend (inferred) the District Plan to ensure a clear pathway for existing primary production activities to continue in the rural zones of the Far North District.	Support	Allow	SFNZ supports the need for flexible primary production land-use policies and rules to ensure land owners/managers can optimise the productive use of their lands.
FS176.11	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)	S527.009	General	General / Plan Content / Miscellaneous	Amend the PDP to actively protect areas where kiwi or indigenous species classed as threatened or at risk (under NZ Threat Classification System) are present. For example, landowners should be required to contact DOC for a trained detection dog or other investigation, and agree with DOC a clear plan to protect vulnerable species, before any vegetation clearance starts. Where appropriate, clearance should be staggered over time, so that indigenous species are able to move to shelter. Insert an appendix to the PDP to include, or refer to, a protocol that sets out guiding principles and procedures.	Oppose	Disallow	The provisions of the NES-PF and the NPS-IB provide an appropriate national framework for managing vegetation clearance. The submitter seeks restrictions that are onerous and unnecessary.

FS176.12	Kapiro Conservation Trust	S442.001	General	General / Plan Content / Miscellaneous	Amend policies and rules relating to vegetation clearance as are too permissive and do not provide sufficient protection for even the minimal maintenance of (a) indigenous vegetation and ecosystems, (b) kiwi and indigenous species classed as threatened or at risk (under the NZ Threat Classification System), (c) freshwater, and (d) other ecological, landscape, character and amenity values.	Oppose	Disallow	The NES-PF and the NPS-IB establish an appropriate regime for vegetation clearance that addresses the concerns raised. The submitter is seeking restrictions that are onerous and unnecessary.
FS176.13	Carbon Neutral NZ Trust	S529.126	Ecosystems and indigenous biodiversity	IB-R2	Amend Rule IB-R2 to apply to vegetation that includes indigenous vegetation.	Oppose	Disallow	The submitter seeks relief that would capture the understory of a plantation forest which would be onerous and unnecessary. The NES-PF and NPS-IB establish an appropriate national framework for managing these issues.
FS176.14	Pacific Eco-Logic	S451.011	General	General / Process	Insert a package of non-regulatory methods to promote and assist landowners to protect significant indigenous vegetation and habitats of indigenous fauna. This could include 1. Rate relief/postponement for areas	Support	Allow	The DP should recognise and support landowners/managers that actively manage indigenous biodiversity.

					under permanent/ long-term protection				
					2. Grants for plant and animal pest control, fencing and wetland restoration				
FS176.15	Bentzen Farm Limited	S167.008	Natural hazards	NH-P9	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring the following for vulnerable activities: a. setbacks from any contiguous scrub or shrubland, woodlot or forestry; b. access for emergency vehicles; and c. sufficient accessible water supply for firefighting purposes	Oppose	Disallow	It is not clear what is meant by vulnerable activities making the relief sought uncertain. As a manager of large areas of plantation forests, SFNZ is concerned about changes in climate increasing the risk of wildfire and NZ's history of large wildfires being started outside of and spreading into afforested areas.	
FS176.16	Bentzen Farm Limited	S167.010	Natural hazards	NH-R5	Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-1 from Discretionary to Restricted Discretionary Activity. Add the following matters of discretion: a. The availability of water for fire-fighting; b. The scale of the extension or alteration;	Oppose	Disallow in part	Any restriction of discretion must include a means of managing the risk of fire spread from the activity needing consent to any surrounding vegetation. Such means must include passive management and not rely solely on active management.	

- c. Alternative options for the location of the extension or alteration;
- d. The use of building materials to reduce fire risk;
- e. The extent and type of vegetation present and
- f. The nature and density of any planting to reduce fire risk, including use of low flammability species.

FS176.17	Fire and Emergency New Zealand	S512.023	Natural hazards	NH-R6	Amend NH-R6	Support	Allow	Clarifies what is required to adequately manage the requirements to fight a fire.
					Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) either: <ul style="list-style-type: none"> a. is located on a site that has suitable access to a fire hydrant(s) with sufficient water pressure and supply for firefighting as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice; or 			

b. provides for an **alternative** water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS

4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.

Matters of discretion are restricted to:

- a. The ~~availability~~ **adequacy (volume, pressure and access)** of water for firefighting;
- b. The scale of the extension or alteration;
- c. Alternative options for the location of the extension or alteration;
- d. The use of building materials to reduce fire risk; and
- e. The extent and type of vegetation present

FS176.18	NZ Agricultural Aviation Association	S182.001	Definitions	New Definition	Include a new definition Agricultural aviation activities. means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or	Support	Allow	As set out in the original submission.
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biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).

FS176.19	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)	S521.002	General	General / Plan Content / Miscellaneous	Amend PDP to acknowledge that the climate emergency requires a new approach in the district plan right now.	Oppose	Disallow	It is not clear what relief the submitter is seeking.
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