

Online Further Submission

Further Submitters Name Pacific Eco-Logic

Further Submitter Number FS225

Wish to be heard Yes

FS qualifier a person representing a relevant aspect of the public interest (e.g. community group)

FS qualifier reason Pacific Eco-Logic undertakes considerable amounts of pro bono community work ranging from ecological restoration and planning to seeking workable and effective environmental policy

Joint presentation Yes

Attention: Victoria Froude

Contact organisation Pacific Eco-Logic

Address for service 5D Deeming Road, RD1 Russell
Russell, Northland 0272

Telephone [094038898](tel:094038898)

Mobile [021 077 3378](tel:0210773378)

Email victoriafroude@gmail.com

Online further submitter? Yes

Date raw FS lodged 04/09/2023 12:01pm

FS225

FS225.001-.019

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
FS225.2	Director-General of Conservation (Department of Conservation)	S364.035	Ecosystems and indigenous biodiversity	Policies	Insert a separate policy for mapping additional SNAs as they are identified	Support	Allow	The National Policy Statement on Indigenous Biodiversity is now operative. It requires the Council to have completed an assessment and include within the District Plan the location, a map and a description of attributes for all Significant Natural Areas by 2027-28. While consultants have identified and mapped SNAs, community consultation has yet to occur. Given the national requirement and scale of areas identified so far, it would be appropriate for the Central Government to assist with this process.

FS225.3	Director-General of Conservation (Department of Conservation)	S364.041	Ecosystems and indigenous biodiversity	IB-P6	Amend Policy IB-P6 as follows: Require landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species At Risk or Threatened indigenous fauna , including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.	Support	Allow	The amended policy provides direction to reduce risk to at-risk and vulnerable fauna.
FS225.4	Director-General of Conservation (Department of Conservation)	S364.046	Ecosystems and indigenous biodiversity	IB-R3	Delete Rule IB-R3 and amend the rules to only allow the removal of indigenous vegetation as a permitted activity in specific circumstances that have an identified need. The removal of indigenous vegetation for non-specified purposes should require resource consent as a non-complying activity.	Support	Allow	The current rule will enable the incremental loss of SNAs.
FS225.5	Director-General of Conservation (Department of Conservation)	S364.048	Ecosystems and indigenous biodiversity	IB-R5	Amend Rule IB-R5 to a non-complying activity status.	Support	Allow	To ensure consistency with the relief sought for IB-R3 by the DG Conservation.
FS225.6	Director-General of Conservation (Department of Conservation)	S364.040	Ecosystems and indigenous biodiversity	IB-P5	Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that: a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils; b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within Significant Natural Areas in some circumstances; c. allows for maintenance, use and operation of existing structures, including infrastructure; and	Support	Allow	The proposed changes provide a more appropriate way to manage land use and subdivision concerning SNAs.

d.enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure.

FS225.7	Director-General of Conservation (Department of Conservation)	S364.030	Natural hazards	NH-P13	Retain Policy NH-P13	Support	Allow	The policy assists with implementing NZCPS Policy 25, which seeks to discourage hard protection surfaces and promotes alternatives.
FS225.8	Director-General of Conservation (Department of Conservation)	S364.057	Subdivision	SUB-R17	Insert more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter.	Support	Allow	This rule pre-supposes that there are identified SNAs, whereas the current plan does not include any. Additional provisions are needed to address/provide for SNAs that have not been identified in the District Plan.
FS225.9	Director-General of Conservation (Department of Conservation)	S364.058	Subdivision	SUB-R17	Review all restricted discretionary activity and controlled activity rules and add matters of discretion/control for indigenous biodiversity where not already identified. Alternatively, and preferably, formally include sites that meet SNA criteria under Schedule 4 of the Proposed District Plan.	Support	Allow	This rule pre-supposes that there are identified SNAs, whereas the current plan does not include any. Additional provisions are needed to address/provide for SNAs that have not been identified in the District Plan.
FS225.10	Director-General of Conservation (Department of Conservation)	S364.073	Earthworks	Rules	Amend earthworks policies and rules to allow consideration and management of kauri dieback.	Support	Allow	Earthworks policies and rules should address the management of kauri dieback.
FS225.11	Director-General of Conservation (Department of Conservation)	S364.075	Light	Policies	Insert an objective, policy, and/or rule (inferred) with lighting recommendations in line with the following document, which New Zealand is a party to as part of the United Nations Convention on Migratory Species: National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds -DAWE In summary, best practice lighting design incorporates the following design principles:	Support	Allow	These lighting principles should better protect seabirds and migratory shorebirds.

1.Start with natural darkness and only add light for specific purposes.

2.Use adaptive light controls to manage light timing, intensity and colour.

3.Light only the object or area intended – keep lights close to the ground, directed and shielded to avoid light spill.

4.Use the lowest intensity lighting appropriate for the task.

5. Use non-reflective, dark-coloured surfaces.

6. Use lights with reduced or filtered blue, violet and ultraviolet-wavelengths with a correlated colour temperature of 2700K or warmer

FS225.12	Director-General of Conservation (Department of Conservation)	S364.076	Light	Rules	<p>Insert an objective, policy, and/or rule (inferred) with lighting recommendations in line with the following document, which New Zealand is a party to as part of the United Nations Convention on Migratory Species: National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds -DAWE</p> <p>In summary, best practice lighting design incorporates the following design principles:</p> <p>1.Start with natural darkness and only add light for specific purposes.</p> <p>2.Use adaptive light controls to manage light timing, intensity and colour.</p> <p>3.Light only the object or area intended – keep lights close to the ground, directed and shielded to avoid light spill.</p> <p>4.Use the lowest intensity lighting appropriate for the task.</p>	Support	Allow	These lighting principles should better protect seabirds and migratory shorebirds.
----------	--	----------	-------	-------	--	---------	-------	--

5. Use non-reflective, dark-coloured surfaces.

6. Use lights with reduced or filtered blue, violet and ultraviolet-wavelengths with a correlated colour temperature of 2700K or warmer

FS225.13	Director-General of Conservation (Department of Conservation)	S364.002	SCHED4 - Schedule of significant natural areas	SCHED4 - Schedule of significant natural areas	Insert SNAs in the plan using the report prepared for Council titled "Significant Indigenous Vegetation and Habitats of the Far North District - Volume 1" prepared by Wildlands Consultants (Contract Report No. 4899d, December 2019) to include SNAs in the Proposed District Plan.	Support	Allow in part	The National Policy Statement on Indigenous Biodiversity is now operative. It requires the Council to have completed an assessment and include within the District Plan the location, a map and a description of attributes for all Significant Natural Areas by 2027-28. While consultants have identified and mapped SNAs, community consultation has yet to occur. Given the national requirement and scale of areas identified so far, it would be appropriate for the Central Government to assist with this process.
FS225.14	Director-General of Conservation (Department of Conservation)	S364.032	Ecosystems and indigenous biodiversity	IB-O2	Amend the wording of Objective IB-O2 as follows: Indigenous biodiversity is managed to maintain its extent and diversity protected, maintained, and restored in a way that provides for the social, economic and cultural well-being of people and communities.	Support	Allow	Promotes the protection and restoration of indigenous biodiversity
FS225.15	Director-General of Conservation (Department of Conservation)	S364.004	General	General / Plan Content / Miscellaneous	Amend all restricted discretionary activity and controlled activity rules to insert matters of discretion/control for indigenous biodiversity where appropriate and not already identified (inferred).	Support	Allow	Improved provisions are needed to implement s6(c) of the Resource Management Act and the National Policy Statement on Biodiversity.
FS225.16	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	Support	Allow	Improved provisions are needed to implement s6(c) of the Resource Management Act and the National Policy Statement on Biodiversity.

inline with 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.

FS225.17	Northland Regional Council	S359.005	Directions Overview	Directions Overview	Insert strategic direction in the Plan on climate change, including:	Support	Allow	More emphasis on responding to climate change is needed in the Plan.
					<ul style="list-style-type: none"> • A clear statement on how the district plan enables the district's communities to respond to climate change (e.g. an objective could be framed along the lines of "Far North District communities are prepared for the impacts of climate change and an equitable transition to a low emission economy", and policies could include: "Provide for development patterns that are resilient to climate change impacts" and "Support the inclusion of design features that take into account the impacts of climate change and the need to transition to a low-carbon economy in proposals for land use, subdivision and development"). • Signal that zoning, overlays and controls on subdivision, use and development are used to minimise risk from natural hazards, protect high value resources that enable climate change responses or are particularly vulnerable to predicted impacts (such as indigenous biodiversity, elite soils and renewable energy generation). They also 			

					promote development patterns and land uses and associated transport / infrastructure that enable emissions reduction (such as mixed-use zoning, higher residential density in serviced areas, renewable energy generation and special purpose zoning such as horticulture).			
FS225.18	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 to protect the values of these resources and to manage nuisance such as shading, plant pest spread and fire risk.	Support	Allow	Specific controls on exotic carbon farming are needed to address better the risks, including fire, pests and wilding spread.
FS225.19	Northland Regional Council	S359.027	General	General / Plan Content / Miscellaneous	Amend the plan to reconsider mechanisms to protect Class 1, 2 and 3 (and possibly some class 4) soils as a valuable natural resource	Support	Allow	The National Policy Statement on Highly Productive Land likely requires additional plan mechanisms to protect Class 1,2 and 3 soils as a valuable resource.
FS225.20	Director-General of Conservation (Department of Conservation)	S364.032	Ecosystems and indigenous biodiversity	IB-O2	Amend the wording of Objective IB-O2 as follows: Indigenous biodiversity is managed to maintain its extent and diversity protected, maintained, and restored in a way that provides for the social, economic and cultural well-being of people and communities.	Support	Allow	Protection and restoration should be part of Objective IB-02.