

**Far North District Council
Far North Proposed District Plan**

TO: Proposed District Plan
Far North District Council
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SUBMISSION ON: Proposed District Plan

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Submission

This feedback is on behalf of Manulife Forest Management (NZ) Ltd (MFM). MFM manages approximately 15,526 ha of plantation forest in the Far North District on behalf of our client Taumata Plantations Limited. Of the total area under management approximately 16% is indigenous reserves. MFM relies on robust Council rules that are consistent and provide clarity to ensure plantation forestry operations can continue.

MFM supports the reference to the National Environmental Standard for Plantation Forestry in the plan for clarification and certainty to its users. MFM questions the inequitable activity status for plantation forestry against all other primary production activities. It is important for the economy and environmental outcomes that plantation forestry is recognised and enabled in the Far North District.

MFM welcomes information sharing opportunities with the Council by providing forest boundary layer to ensure Significant Natural Areas are kept outside of the forest boundary. MFM are also interested in exploring the concept of sharing quarry locations and the implication of this.

MFM are members of the Northland Forestry environmental Working Group which Council attends too. MFM would like to take the opportunity to acknowledge Council on their attendance and sharing of information to date.

The specific provisions of the Plan that MFM submission relates to is outlined in the below table.

MFM **could not** gain an advantage in trade competition through this submission.

If others make a similar submission, MFM will consider presenting a joint case with them at hearing. MFM are happy to present via Microsoft Teams.

A handwritten signature in blue ink, appearing to read 'UB', with a long horizontal flourish extending to the right.

Ursula Buckingham
Environmental Planner
Manulife Forest Management

Plan Provision	Support or Oppose	MFM Submission	Relief Sought
Part 1 Definition – Plantation forestry activities and plantation forestry	S	This definition is consistent with the NES PF and as suggested in the National Planning Standards using the definition from Part 1 of the NES PF would provide certainty. To provide certainty to what activities are covered by this definition the same use of words should be used as the definitions.	Maintain definition as currently written and update in line with NES PF review to include carbon forestry.
Part 1 Definition – Farm Quarry	S in part		means the extraction of aggregates which are: 1. taken for use ancillary to farming and horticulture, including for farm and <u>plantation forestry tracks, access ways and hardstand areas, and</u> 2. only used <u>on the same property or on the same property ownership within the same production unit, where the extraction was undertaken, and</u> 3. <u>not sold, or exported or removed from the production unit of origin</u>
Part 1 Definition - Farming	S in part	Support the exclusion of production forestry as it is defined.	Maintain definition as currently written. However, throughout the plan there is reference to farming in many of the objectives, policies and or rules. It would be better to replace farming with primary production OR add plantation forestry into the farming definition.
Part 1 Definition – Highly Productive Land activities	S in part	This definition does not provide certainty and is open to interpretation. LUC class 1 to 4 should be included in this definition.	Means land that is, or has the potential to be, highly productive for farming activities. It includes versatile soils and Land Use Capability Class <u>1 to 4</u> land and other Land

S160.001 &
S160.002

S160.003

S160.004

S160.005

<p>Part 1 Definition – Primary Production activities</p>			<p>Use Capability classes Land Use Capability, or has the potential to be, highly productive having where that land shows regard to: A through to d OR Consistent with versatile soils.</p>	<p>S160.006</p>
<p>Part 1 Definition – Quarry and Quarrying activities</p>	<p>S in part</p>	<p>The definition references forestry activities however forestry activities are not defined. To provide certainty replace forestry activities with plantation forestry activity. Definition is clear and provides certainty.</p>	<p>Means: a. any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or plantation forestry activities; and Maintain definition as currently written.</p>	<p>S160.007</p>
<p>Part 2 District Wide Matters – Strategic Direction Economic and social wellbeing</p>	<p>S</p>	<p>Objective SD-SP-03 Recognise the value and importance of primary production activities across the Far North District and the cultural, social, environmental, and economic wellbeing the sector brings to the district. The primary production provides employment, recreation, and economic benefits to the region. It is important to recognise this and ensure equitable opportunities for all primary producers.</p>	<p>Retain objective</p>	<p>S160.008</p>
<p>Part 2 District Wide Matters – Strategic Direction Infrastructure and electricity</p>	<p>S</p>	<p>Objective SD-IE-01 Infrastructure is increasingly important to the primary industry to ensure products can get to market. A robust infrastructure plan is vital to sustain the sector.</p>	<p>Retain objective</p>	<p>S160.009</p>
<p>Part 2 District Wide Matters – Strategic Direction Rural environment</p>	<p>S</p>	<p>Objective SD-RE-01 Recognise and acknowledge the important role the primary sector currently and potential has in the community.</p>	<p>Retain objective</p>	<p>S160.010</p>

<p>Part 2 District Wide Matters – Strategic Direction Natural environment</p>	<p>S in part</p>	<p>Objective SD-EP-03 The districts <i>rare threatened and endangered</i> indigenous biodiversity should be protected maintained and increased. This needs to be enforced on all landowners to ensure equity across all sectors. 42% of the Far North District is in indigenous vegetation, therefore attention need to be directed on those areas of significance or where there are rare threatened or endangered species.</p>	<p>Active management of ecosystems to protect, maintain and increase <u>rare threatened and endangered</u> indigenous biodiversity for future generations.</p>	<p>S160.011</p>
<p>Part 2 District Wide Matters – Strategic Direction Natural environment</p>	<p>S</p>	<p>Objective SD-EP-04 Support the use of a range of trees indigenous and exotic to achieve this objective.</p>	<p>Retain objective</p>	<p>S160.012</p>
<p>Part 2 District Wide Matters – Strategic Direction Natural environment</p>	<p>S in part</p>	<p>Objective SD-EP-06 Support the protection of significant indigenous vegetation and habitat where the areas can be mapped and managed accordingly. These areas should exclude all plantation forestry areas.</p>	<p>Grammatical change: Areas of significant indigenous vegetation and significant habitats of indigenous fauna and <u>are</u> protected for current and future generations.</p>	<p>S160.013</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Ecosystems and indigenous biodiversity</p>	<p>S</p>	<p>Objective IB-01 It is important that SNAs are identified to provide certainty to landowners.</p>	<p>Retain objective</p>	<p>S160.014</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Ecosystems and indigenous biodiversity</p>	<p>S</p>	<p>Objective IB-02 It is important that indigenous biodiversity is managed to consider social, economic and cultural well-being of people and communities.</p>	<p>Retain objective</p>	<p>S160.015</p>
<p>Part 2 District Wide Matters – Natural Environmental Values</p>	<p>S in part</p>	<p>Policies IB-P1 Mapping of SNAs is critical to provide certainty to the landowner. Relying on a</p>	<p>Reward to state all SNAs will be mapped.</p>	<p>S160.016</p>

<p>Ecosystems and indigenous biodiversity</p>		<p>definition that is open to interpretation or requires experts to carry out surveys is not conducive to managing SNAs.</p>		<p>S160.017</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Ecosystems and indigenous biodiversity</p>	<p>S in part</p>	<p>Rules IB-R1 The NES PF currently provides rules around vegetation clearance including around and in SNA. This is reflected in Rule IB-R1-13.vii. However, Rule IB-R1-10 by the timeline excludes plantation forestry due to the forest rotation.</p>	<p>Amend IB-R1-10 to allow for the forest rotation of 28 years.</p>	<p>S160.018</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Ecosystems and indigenous biodiversity</p>	<p>O</p>	<p>Rules IB-R5 A discretionary activity status is onerous and unnecessary. The lack of mapping of SNAs and the reliance of interpreting the definition or use of a qualified expert is onerous and provides no certainty to the landowner.</p>	<p>Council needs to work with the industry to established SNA boundaries. Understorey, unused tracks/roads, set back areas, riparian zones all need to be managed differently to ensure plantation forestry activities can occur.</p>	<p>S160.019</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Natural Character</p>	<p>S</p>	<p>Rule NATC-R1-PER-2.5 MFM support rule R1-PER-2.5.</p>	<p>Retain rule.</p>	<p>S160.020</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Natural Character</p>	<p>O</p>	<p>Rule NATC-R2-PER-1 The inclusion of farming tracks but the exclusion of plantation forestry tracks is not fair or equitable.</p>	<p>Amend rule to include production forestry tracks.</p>	<p>S160.021</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Natural features and landscapes</p>	<p>O</p>	<p>Policies NFL-P4 This policy is very subjective and can be interpreted in many ways. Including only farming and not all primary production is not fair or equitable.</p>	<p>Amend policy to: Provide for <u>primary production farming</u> activities within ONL and on ONF where:</p>	<p>S160.022</p>
<p>Part 2 District Wide Matters – Natural Environmental Values Natural features and landscapes</p>	<p>O</p>	<p>Rule NFL-R2-PER-1 The inclusion of farming tracks but the exclusion of plantation forestry tracks is not fair or equitable.</p>	<p>Amend rule to include production forestry tracks.</p>	

Part 2 District Wide Matters – Natural Environmental Values Natural features and landscapes	O	Rule NFL-R5 A discretionary activity is onerous and does not allow for ONL and ONF in rural production land to be established.	Delete rule.	S160.023
Part 2 District Wide Matters – General District Wide Matters Activities on the surface of water	S	Rule ASW-R3 Structures MFM supports this permitted activity status.	Retain rule.	S160.024
Part 2 District Wide Matters – General District Wide Matters Coastal environment	O	Policies CE-P6 Including only one sector of the primary production is not fair or equitable. Large tracks of forestry are already established in the coastal environment largely planted to prevent erosion to the coastal sand dunes. Plantation forestry is a valuable tool in the coastal environment to prevent ongoing erosion.	Amend policy to include primary production.	S160.025
Part 2 District Wide Matters – General District Wide Matters Coastal environment	O	Rule CE-R6 Production forestry is already established in the coastal environment and is a valuable land use in the prevention of erosion. Making production forestry a discretionary activity is onerous.	Delete rule.	S160.026
Part 2 District Wide Matters – General District Wide Matters Earthworks	O	Policy EW-P1 This policy should be supporting all primary production.	Amend policy: b. rural land uses and development including, farm tracks, land drainage, and other primary production farming activities within the Rural zones;	S160.027
Part 2 District Wide Matters – General District Wide Matters Earthworks	O	Rule EW-R3 and R4 and R5 These three rules should include all primary production activities to provide clarity. The current rules provide no certainty for	Reword rules to include primary production or plantation forestry.	S160.028 to S160.030

Part 2 District Wide Matters – General District Wide Matters Mineral extraction overlay		landowners with plantation forestry and farming activities.	
Part 3 Area Specific Matters – Zones Rural Production	S	Objective ME-03 MFM supports this objective. Note MFM have many active quarries in its managed estate. If Council believe it is of benefit to have these quarries mapped or listed in the Council system. It is a conversation MFM are happy to have.	Retain objective.
Part 3 Area Specific Matters – Zones Rural Production	S	Objectives RPROZ-01/02/04 MFM supports these objectives.	Retain objectives
Part 3 Area Specific Matters – Zones Rural Production	S	Policies RPROZ-P1/P2/P3/P4/P5 MFM supports these policies.	Retain policies.
Part 3 Area Specific Matters – Zones Rural Production	S in part	Rules RPROZ-R15 MFM client has no land classified as versatile soils so therefore supports this rule. However, versatile soils should be available to be used but all primary production. The only land use versatile soils should not support is housing/industrial as these land uses are not reversible. Production forestry can be planted, harvested, and converted back to horticulture or farming land.	Amend to exclude PER-1 – it is not located on versatile soils.
Part 3 Area Specific Matters – Zones Rural Production		Rule RPROZ-S3 MFM cannot find in the plan where setbacks might be included to ensure buildings are not built within 30metres of production forestry land.	Include a rule to prohibit buildings being erected within 30m of production forestry.

S160.031

S160.032 to
S160.034

S160.035 to
S160.039

S160.040

S160.041