## Online Further Submission

Further Submitters Name

Harold Corbett

**Further Submitter Number** 

FS58

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)

Further Submitter #58

FS58.01 -58.13

FS qualifier reason

Ratepayer in FNDC

Joint presentation

Yes

Attention:

Harold Corbett

**Contact organisation** 

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Online further submitter?

Yes

Date raw FS lodged

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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
FS58.1	Lynley Newport	S128.002	Ecosystems and indigenous biodiversity	IB-P6	Amend Policy IB-P6 by making it IB-Pl and by deleting the word "consideration of" from the preamble and simply saying:" through the following non-regulatory methods:". In summary, to be reworded as follows:  Encourage the protection, maintenance	Support	Allow	Prioritises IB-P6
					and restoration of indigenous biodiversity,			

with priority given to
Significant Natural
Areas, through **the following** nonregulatory methods
<del>including consideration</del>
<del>of</del> ...

FS58.2 Lynley Newport S129.001  Ecosystems and and indigenous biodiversity  If adverse effects on indigenous species, habitats cannot be avoided, remedied or mitigated in accordance with IB-P2 and/or P3, consider whether it is appropriate to apply the following steps as an effects management hierarchy: (remainder unchanged)  Lynley Newport S129.001  Ecosystems IB-P4 Amend IB-P4 to read: Support Allow Offsetting should be available in all environments. Furthermore, positive past actions by landowners should be considered as Offsets for future action. This would encourage landowners to undertake multiple positive actions for indigenous species and effects management hierarchy: (remainder unchanged)

FS58.3	Green Inc Ltd	S164.001	Planning maps	Rural Production Zone	amend zoning of Tupou from Rural Production to a new special zone such as managed ecological zone or a special purpose zone for Tupou.  Tupou  NA11D/1151  NA42C/379  NA55B/383  NA71D/247  NA102A/98  NA102A/99  NA102A/100  NA115C/434  NA136/174  NA136/235  NA140/216  NA262/283  NA315/329  NA340/269  NA357/153  NA245/209	Support	Allow	Tupou is a large coastal Northland property that has been managed as a typical hill country sheep and beef farm. If the new owners wish to implement large scale biodiversity positive reforestation and pest control then they should be encouraged not penalised through constraints on potential future uses. Financing such operations will require multiple aligned revenue streams including from environmental tourism, carbon sequestration, sustainable farming, human enjoyment, solar energy, and other as yet unknown uses.  Tupou includes areas in the Rural Production and Coastal zones. Reforestation and pest control will lead to much of the property becoming significant natural area. As such, under the PDP as proposed the restrictions on activities act as strong disincentives. A Special Purpose Zone should be granted for Tupou. This would encourage implementation of the requisite management plan which would detail the biodiversity operations (plantings, pest control etc) and preserve flexibility for future potential land uses which a SNA would prohibit. The sheer size of Tupou and the extent of the planned biodiversity improvements means that a Special Purpose Zone is the most appropriate tool.
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FS58.5	Setar Thirty Six Limited	S168.013	Natural Environment	SD-EP-O5	Amend Objective SD-EP-O5 as follows:  The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations, including their restoration.	Support	Allow	Include restoration: "The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations, including their restoration."
FS58.5	Arahia Burkhardt Macrae	S255.003	Ecosystems and indigenous biodiversity	IB-R1	Insert a new rule equivalent to SUB-R6 (Environmental Benefit Subdivision) but for landuse which Rewards landowners who have already protected areas, and incentivises landowners to protect areas.	Support	Allow	Very important that past actions for biodiversity gains are recognised and landowners are incentivised to net biodiversity gains.
FS58.6	Arahia Burkhardt Macrae	S255.004	Ecosystems and indigenous biodiversity	IB-R3	Amend rule to increase the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place (such as provided for in SUB-R6 Environmental Benefit Subdivision rule).	Support	Allow	Increase the permitted activity clearance and land disturbance allowances so as not to unduly penalise landowners who, through their efforts, created or significantly enhanced biodiversity in the area. Refer also original submission S487 which suggest activity levels.
FS58.7	Arahia Burkhardt Macrae	S255.005	Ecosystems and indigenous biodiversity	IB-R4	Amend rule to increase the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place (such as provided for in SUB-R6	Support	Allow	Increase the amount of permitted activity (clearance and land disturbance) to incentivise/reward landowners who have/are protecting or wanting to protect/enhance/create areas of indigenous vegetation. Refer also S487 which suggests activity levels.

Environmental Benefit
Subdivision rule).

FS58.8	Ministry of Education Te Tāhuhu o Te Mātauranga	S331.043	Ecosystems and indigenous biodiversity	IB-P5	Retain policy IB-P5, as proposed.	Support	Allow	Environmental participation, awareness and education are vital to improving outcomes for biodiversity. Retain IB-P5 and expand to include: [e] does not impose unreasonable restrictions on rural land use of indigenous forest for carbon storage, biodiversity and tourism (as imagined in our submission for Tupou). Such land use does more for indigenous biodiversity than a designation of SNA. Associated land use and development should be enabled not controlled.
FS58.9	Director-General of Conservation (Department of Conservation)	S364.038	Ecosystems and indigenous biodiversity	IB-P3	Amend Policy IB-P3 as follows:  Outside the coastal environment:  a. avoid, remedy or mitigate significant adverse effects of land use and subdivision on Significant Natural Areas to ensure adverse effectsare no more than minor; and  b. avoid, remedy or mitigate adverse effects of landuse and subdivision on areas of important andvulnerable indigenous vegetation, habitats andecosystems to ensure there are no significantadverse effects.	Oppose	Disallow	The PDP must encourage landowners to support native flora and fauna. The change suggested by DOC will penalise landowners who effectively, through planting and pest control, create/establish/maintain/enhance an SNA. Rather, it encourages landowners to minimise management and so minimise any values that could constrain any desired future use. Wording in PDP should not change.

FS58.10	Kapiro Conservation Trust	S442.080	Ecosystems and indigenous biodiversity	IB-P5	Delete in the first instance, if not deleted then amend as follows:  "Ensure that the management of land use, development and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that:  a) Does not impose unreasonable restrictions on Allows for existing primary production activities, to continue particularly on highly versatile soils where the Significant Natural Areas's values are protected and indigenous biodiversity values are maintained;	Oppose	Disallow	Retain IB-P5 and expand to include: [e] does not impose unreasonable restrictions on rural land use of indigenous forest for carbon storage, biodiversity and tourism (as imagined in our submission for Tupou). Such land use does more for indigenous biodiversity than a designation of SNA. Associated land use and development should be enabled not controlled.
FS58.11	Kapiro Conservation Trust	S442.176	Ecosystems and indigenous biodiversity	IB-P4	Amend (a) to require a net gain in indigenous biodiversity; and  Amend (b) to reflect the need for compensation up to a net gain; and  Amend definitions of biodiversity offsetting and biodiversity compensation to reflect need for net gain.	Support in part	Allow in part	Offsetting must recognise past as well as future actions. Biodiversity gains from past actions must be recognised in the Offsetting rule on Additionality. Exclusion of this is another disincentive to start biodiversity positive actions now (rather than when/if a need for offsetting is realised).

FS58.12	Marianna Fenn	S542.006	Ecosystems and indigenous biodiversity	IB-P4	Amend (a) to require a net gain in indigenous biodiversity; and  Amend (b) to reflect the need for compensation up to a net gain; and  Amend definitions of biodiversity offsetting and biodiversity compensation to reflect need for net gain	Support in part	Allow in part	Offsetting must recognise past as well as future actions. Biodiversity gains from past actions must be recognised in the Offsetting rule on Additionality. Exclusion of this is another disincentive to start biodiversity positive actions now (rather than when/if a need for offsetting is realised).
FS58.13	Marianna Fenn	S542.006	Ecosystems and indigenous biodiversity	IB-P4	Amend (a) to require a net gain in indigenous biodiversity; and  Amend (b) to reflect the need for compensation up to a net gain; and  Amend definitions of biodiversity offsetting and biodiversity compensation to reflect need for net gain	Support	Allow	Refer IB-P4a: As per original submission, revise (a): a. biodiversity offsetting to address more than minor residual adverse effects to achieve a net gain in indigenous biodiversity.