

Online Further Submission

FS85

Further Submitters Name	PF Olsen Ltd
Further Submitter Number	FS85
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 (PF Olsen) operating within the Far North District.
Joint presentation	Yes
Attention:	Ms. Monique Furieri Bedim
Contact organisation	PF Olsen
Address for service	396 Childers Road Gisborne 4040
Telephone	06868 5426
Mobile	021 240 9004
Email	monique.bedim@pfolsen.com
Online further submitter?	Yes
Date raw FS lodged	04/09/2023 11:56am

FS85.001-.054

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
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FS85.7	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).	Oppose	Disallow	The relief sought by the submitter is very open and there is no identification of each land use is captured by the rationale of the rule is trying to support. This should be avoided by the District Council when making rules, as too uncertain.
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FS85.8	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 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 	Oppose	Disallow	The inclusion of the rules, as suggested by the submitter, is unnecessary, as the NPS-IB should take precedence.
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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.

FS85.12

Kiwi Fresh Orange Company Limited

S554.005

General

General /
Plan Content
/
Miscellaneous

Amend the PDP to consistently refer to Highly Productive Land, rather than Productive Land or Versatile Land.

Support

Allow

The terms highly productive land and versatile land should be consistent with the NPS-HPL.

FS85.16	Northland Federated Farmers of New Zealand	S421.017	Rural Environment	Objectives	<p>Insert new Objective SD-RE-O3 as follows:</p> <p>Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands.</p> <p>or wording with similar intent</p>	Support	Allow	<p>Primary productions should be supported and encouraged by Councils as brings great economic value to the community. The inclusion of the SD-REO3 would allow more certainty for the primary sector. It is also a way of recognising the partnership between the Council and the primary industry.</p>
FS85.17	Royal Forest and Bird Protection Society of New Zealand	S511.036	Rural Environment	Objectives	<p>Insert an additional clause to SD-RE as follows:</p> <p>Ensure that within rural areas the establishment and operation of primary production activities are not limited by new incompatible sensitive activities and limit those other activities in the rural areas</p>	Support	Allow	<p>PF Olsen supports this submission provided that primary production is not limited by incompatible sensitive activities rules.</p>

FS85.18	Te Hiku Iwi Development Trust	S399.056	Sites and areas of significance to Māori	Policies	Insert a new policy as follows:	Oppose	Allow in part	The inclusion of the principles of the Treaty of Waitangi when processing resource consent and the plan changes is very important. Section 74 (2A) states that territorial Authority must take into account any iwi relevant planning.
					Protect and preserve the culturally significant landscapes identified in iwi/hapū management plans held by Council from inappropriate land use, subdivision and development by:			
					a) Identifying the Area of Interest for iwi/hapū management plans on planning maps;			
					b) Recognising and providing for the spiritual, cultural and historical relationship of iwi/hapū with the area identified in the plan(s);			
					c) requiring that resource consent applications within or adjacent to the sites identified as significant within the relevant iwi/hapū management plan demonstrate that they have had regard to that Management Plan;			
					d) provide an assessment of consistency with the vision, objectives and desired outcomes outlined in the Management Plan;			
					e) provide an assessment of effects on values identified in the plan and provide, where relevant,			

**evidence of outcomes of
consultation with and/or
cultural advice provided
by tangata whenua.**

**f) considering the
relevant iwi authority or
hapū as an affected
person for any activity
within the area where the
adverse effects are
considered minor or
more than minor.**

FS85.19	Summit Forests New Zealand Limited	S148.013	Sites and areas of significance to Māori	Rules	Amend the rules under Sites and areas of significance to Māori to provide for the removal of plantation forest trees from a scheduled site and areas of significance to Māori under an authority issued by Heritage New Zealand Pouhere Taonga as a permitted activity	Support	Allow	PF Olsen supports Summit Forest submission, mainly because there are recognised protocols in place regulating forestry activities within the sites of significance to Maori, which achieve the right protection for Maori culture. Therefore, is paramount o amend the rule to downgrade the activity status to permitted. Furthermore, the Natural and Built Environment Bill, which passed its 3rd reading and just needs Royal Assent to become law, does not support non- complying activity status.
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FS85.20

Roger Myles Smith

S411.003

Ecosystems
and
indigenous
biodiversity

IB-O1

- Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing
- Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners
- Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land
- If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.

Support

Allow in part

The National Policy Statement for Indigenous Biodiversity (NPS IB) has now been released and includes new SNA criteria to be applied nationally. It also requires that District Plans must identify all areas that meet SNA criteria, including the location and a map of the area.

- Make SNA mapping available publicly, even if it is not part of the PDP.

FS85.30	Summit Forests New Zealand Limited	S148.014	Ecosystems and indigenous biodiversity	IB-P5	Retain IB-P5	Support	Allow	PF Olsen supports Summit Forest's submission in retaining IB-P5 wording as this is consistent with the entire DP and recognised the primary production activity at the same time enables Maori land to be used in a way that supports social, economic and cultural well-being fulfilling the principles set in s 5 of RMA.
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FS85.31	Ballance Agri-Nutrients Limited	S143.005	Ecosystems and indigenous biodiversity	IB-P5	Retain the policy IB-P5	Support	Allow	PF Olsen supports the Ballance Agri-Nutrients' submission in retaining IB-P5 wording as this is consistent with the entire DP and recognised the primary production activity at the same time, enables Maori land to be used in a way that supports social, economic and cultural well-being fulfilling the principles set in s 5 of RMA.
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FS85.38	Kapiro Conservation Trust	S442.080	Ecosystems and indigenous biodiversity	IB-P5	<p>Delete in the first instance, if not deleted then amend as follows:</p> <p>"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:</p> <p>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;</p> <p>...</p>	Oppose	Disallow	PF Olsen supports the retaining IB-P5 wording as this is consistent with the entire DP and recognised the primary production activity at the same time, enabling Maori land to be used in a way that supports social, economic and cultural well-being fulfilling the principles set in s 5 of RMA.
FS85.46	Summit Forests New Zealand Limited	S148.015	Ecosystems and indigenous biodiversity	IB-P6	Retain IB-P6	Support	Allow	PF Olsen supports SFNZ's submission to retain IB-P6, and the vision that the Plan approaches in balancing economic values with the protection of SNA is consistent with Part 2 of RMA.

FS85.47	Northland Fish and Game Council	S436.033	Ecosystems and indigenous biodiversity	IB-P6	Retain Policy IB-P6	Support	Allow	PF Olsen supports submission to retain IB-P6, and the vision that the Plan approaches in balancing economic values with the protection of SNA is consistent with Part 2 of RMA.
FS85.49	Kapiro Conservation Trust	S442.081	Ecosystems and indigenous biodiversity	IB-P6	Amend IB-P6 to reflect introduction of district wide mapping and rules for SNAs in addition to non-regulatory methods. Amend to include reference to consideration of nature based solutions to mitigating the effects of climate change e.g wetlands and afforestation to mitigate drought and flood effects. Amend to include potential for a reduction or waiver of rates where there is good pest and weed control in place or where maintenance/enhancement of indigenous biodiversity will provide significant ecosystem services e.g. wetland establishment to mitigate flood risk to the wider area.	Oppose	Disallow	PF Olsen supports the retention of the rule IB-P6 as has been drafted. There is no need to include any more unnecessary wording that would cause confusion. Besides, the Plan approaches in balancing economic values with the protection of SNA is consistent with Part 2 of RMA.

FS85.58

Te Rūnanga o
Ngāti Rēhia

S559.023

Ecosystems
and
indigenous
biodiversity

IB-P6

Delete IB-P6 and redraft
with tangata whenua
(inferred).

Oppose

Disallow

PF Olsen
supports the
retention of
the rule IB-P6
as has been
drafted.

FS85.61	Summit Forests New Zealand Limited	S148.022	Ecosystems and indigenous biodiversity	IB-R4	Delete the requirement for a landowner to obtain an ecologist's report proving an area is not an SNA, or in the alternative establish a process whereby Council fully funds such reports when associated with primary production activity.	Support	Allow	Pf Olsen supports SFNZL submission and agrees that the cost for land use to have a suitable ecologist to assess if the area is an SNA or not places an unreasonable burden and it is inconsistent with Policy IB-P5. Besides, it is not fair for the land use to be burdened with this cost, if the National Policy Statement for Indigenous Biodiversity (NPS IB) has now been released and includes new SNA criteria to be applied nationally. It also requires that District Plans must identify all areas that meet SNA criteria, including the location and a map of the area.
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FS85.63

Manu Burkhardt
Macrae

S279.006

Ecosystems
and
indigenous
biodiversity

IB-R4

Provide for an increase in the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place such as provided for in the SUB-R6 Environmental benefit subdivision rule. This would reward landowners who already have protection and incentivise landowners to protect.

Oppose

Disallow

Pf Olsen
opposes this
submission.
The fact the
cost for land
use to have a
suitable
ecologist to
assess if the
area is an SNA
or not places
an
unreasonable
burden and it
is inconsistent
with Policy IB-
P5. Besides, it
is not fair for
the land use to
be burdened
with this cost, if
the National
Policy
Statement for
Indigenous
Biodiversity
(NPS IB) has
now been
released and
includes new
SNA criteria to
be applied
nationally. It
also requires
that District
Plans must
identify all
areas that meet
SNA criteria,
including the
location and a
map of the
area. Rule IB-
R4 should be
deleted or

amended it to not require consent holders to obtain an ecologist's report to prove that the indigenous vegetation is not a SNA.

FS85.75	Summit Forests New Zealand Limited	S148.021	Ecosystems and indigenous biodiversity	IB-R5	Amend IB-R5 to only apply to the clearance of indigenous vegetation within a scheduled SNA within a plantation forest as a discretionary activity that does not meet the requirements of regulation 93 of the NES-PF.	Support	Allow	PF Olsen supports SFNZL submission to amend the rule IB-R5 to be consistent with the NES-PF.
FS85.76	Manulife Forest Management (NZ) Ltd	S160.018	Ecosystems and indigenous biodiversity	IB-R5	Delete rule IB-R5 (implied) and Council needs to work with the industry to establish SNA boundaries. Understory, unused tracks/roads, set back areas, riparian zones all need to be managed differently to ensure plantation forestry activities can occur.	Support in part	Allow in part	PF Olsen prefers the amendment of the current rule to be consistent with the NES-PF standards already in place, as per example, regulation 93.

FS85.81

Marianna Fenn

S542.016

Ecosystems
and
indigenous
biodiversity

IB-R5

Amend to non-complying
activity status

Oppose

Disallow

To make
plantation
forestry and
plantation
forestry
activities a
non-
compliance
activity is
unnecessarily
restrictive and
it is
inconsistent
with provisions
for SNA's in
the National
Environmental
Standards from
Plantation
Forestry.

FS85.87	Summit Forests New Zealand Limited	S148.027	Natural features and landscapes	NFL-P4	Amend NPFL-P4 to read “ Provide for primary production activities within ONL and on ONF where: a. the use forms part of the characteristics and qualities that established the landscape or feature; and b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.” and	Support	Allow	The NFL-P4 lacks fairness in treating various primary production endeavours. Specifically, it overlooks the notion that established plantation forestry within an ONL or ONF should be acknowledged as a valid component of the surroundings. This recognition should extend to permitting such activity while adhering to the guidelines of the NES-PF. It also shows an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
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FS85.88	Manulife Forest Management (NZ) Ltd	S160.021	Natural features and landscapes	NFL-P4	Amend policy as follows: Provide for primary production activities within ONL and on ONF where: <ol style="list-style-type: none"> 1. the use forms part of the characteristics and qualities that established the landscape or feature; and 2. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature. to provide for primary production activities within ONL and ONF.	Support	Allow	PF Olsen supports Manulife Forest Management's submission that narrowing the land use to only farms is a grandparenting rule, and Councils should avoid it as it is unfair to the other land users.
FS85.89	Michael John Winch	S67.025	Natural features and landscapes	NFL-P4	Retain the policies	Oppose	Disallow	The rule NPFL-P4 narrows the land use to only farms is a grandparenting rule, and Councils should avoid it as it is unfair to the other land users.

FS85.96

Summit Forests
New Zealand
Limited

S148.028

Natural
features and
landscapes

NFL-R5

Delete NFL-R5

Support

Allow

PF Olsen supports SFNZL submission as Rule NFL-R5 does not consider the existence of plantation forests and the associated plantation forest activities within an ONL or ONF area. Plantation forestry is a long-term land use and should be treated as a right. The rule how it is written does not provide this to the landowners. Further, there is no provision for non-complying activity under the Natural and Built Environment Bill.

FS85.97

Manulife Forest
Management (NZ)
Ltd

S160.023

Natural
features and
landscapes

NFL-R5

Delete rule NFL-R5
Plantation forestry and
plantation forestry activity.

Support

Allow

PF Olsen supports Manulife submission as Rule NFL-R5 does not consider the existence of plantation forests and the associated plantation forest activities within an ONL or ONF area. Plantation forestry is a long-term land use and should be treated as a right. The rule, how it is written, does not provide this to the landowners. Further, there is no provision for non-complying activity under the Natural and Built Environment Bill.

FS85.98	Ricky Faesen Kloet	S495.013	Natural features and landscapes	NFL-R5	Delete the non-complying activity status applying to Rule NFL-R5	Support	Allow	PF Olsen supports this submission as Rule NFL-R5 does not consider the existence of plantation forests and the associated plantation forest activities within an ONL or ONF area. Plantation forestry is a long-term land use and should be treated as a right. The rule, how it is written, does not provide this to the landowners. Further, there is no provision for non-complying activity under the Natural and Built Environment Bill.
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FS85.99

Kapiro
Conservation Trust

S442.116

Coastal
environment

Notes

Amend

The Earthworks **and Ecosystems and Indigenous Biodiversity** Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks **and ecosystems and indigenous biodiversity chapters** earthworks **indigenous vegetation rules**, the most stringent rule will apply.

Oppose

Disallow

PF Olsen opposes the inclusion of Ecosystem and Indigenous Biodiversity as the rules related to Earthworks. The rationale for the Chapter related to the Coastal environment differs for Ecosystem and Indigenous Biodiversity, and it cannot be transferred to one without a proper s 32 analysis.

FS85.101

Summit Forests
New Zealand
Limited

S148.033

Coastal
environment

CE-R6

Delete CE-R6

Support

Allow

PF Olsen supports Summit Forest New Zealand Limited's submission to delete Rule CE-R6, as it does not consider the existence of plantation forestry within the Coastal Area. Plantation forestry is long-term land use, and this rule will impose a greater prohibition or restriction on the activity. Therefore a more detailed s 32 analysis is required. To remove the certainty of harvest and the ability to undertake other plantation forest activities is unreasonable and not commensurate with evidence-based policies.

FS85.102	Nicole Wooster	S259.016	Coastal environment	CE-R6	Amend rule to consider whether only exotic trees should require resource consent.	Oppose	Disallow	No rationale would impose restrictions on an exotic plantation and would not be imposed on any other plantation. It does not make sense. The rules should be equal and fair to all land users.
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FS85.103

Manulife Forest
Management (NZ)
Ltd

S160.026

Coastal
environment

CE-R6

Delete rule CE-R6

Support

Allow

PF Olsen supports Manulife's submission to delete Rule CE-R6, as it does not consider the existence of plantation forestry within the Coastal Area. Plantation forestry is long-term land use, and this rule will impose a greater prohibition or restriction on the activity. Therefore a more detailed s 32 analysis is required. To remove the certainty of harvest and the ability to undertake other plantation forest activities is unreasonable and not commensurate with evidence-based policies.

FS85.104	Summit Forests New Zealand Limited	S148.036	Earthworks	Rules	Amend the provisions to provide for earthworks associated with plantation forestry and plantation forestry activities as a permitted activity subject to the provisions of the NES-PF.	Support	Allow	PF Olsen supports the SFNZL submission to amend rules that provide for earthworks associated with forestry activities to be regulated by NESP-PF. There is no justification to require plantation forestry earthworks to comply with more stringent standards for earthworks in the Coastal Environment or Natural Features and Landscapes overlays, and for those standards to also not equally apply to other primary production land use.
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FS85.105	Summit Forests New Zealand Limited	S148.038	Earthworks	Rules	Delete any Matters of Discretion that exceed the Council's functions under the RMA.	Support	Allow	Pf Olsen supports SFNZL submission as the earthworks Matters of Discretion go well beyond the scope of the District Council's powers under section 31 of the Resource Management Act.
FS85.107	Summit Forests New Zealand Limited	S148.063	Earthworks	EW-S8	Delete any Matters of Discretion that exceed the Council's functions under the RMA.	Support	Allow	PF Olsen supports the deletion of the EW-S8 standard or this should be clearly identified that does not apply to forestry activities as this is provided by NES-PF.

FS85.108	Summit Forests New Zealand Limited	S148.064	Earthworks	EW-S9	Delete any Matters of Discretion that exceed the Council's functions under the RMA.	Support	Allow	PF Olsen supports the deletion of the EW-S9 standard, or it should be clearly identified that it does not apply to forestry activities as this is provided by NES-PF.
FS85.109	Summit Forests New Zealand Limited	S148.040	Noise	Rules	Amend the chapter to make it clear that noise and vibration associated with all plantation forestry activities is a permitted activity subject to the provisions of regulation 98 of the NES-PF.	Support	Allow	PF Olsen supports SFNZL's submission to amend the chapter to include that noise and vibration associated with all plantation forestry activities is a permitted activity subject to the provisions of regulation 98 of the NES-PF.

FS85.110	Summit Forests New Zealand Limited	S148.045	Rural production	RPROZ-O3	Amend any reference to "farming activities" in the Rural Production objectives to "primary production activities" and any reference to "farming" to "primary production" and any other changes to like effect.	Support	Allow	PF Olsen supports SFNZL's submission to amend c of RPROZ-O3 because primary production is defined under the NSP-HPL, and this definition should be consistent across the legislation. Besides, there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
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FS85.111	Bentzen Farm Limited	S167.092	Rural production	RPROZ-O3	Retain Objective RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
FS85.112	Ballance Agri-Nutrients Limited	S143.013	Rural production	RPROZ-O3	Retain the objective RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.

FS85.113	NZ Agricultural Aviation Association	S182.027	Rural production	RPROZ-O3	Retain RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
FS85.114	Horticulture New Zealand	S159.098	Rural production	RPROZ-O3	Retain Objective RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.

FS85.115	Matauri Trustee Limited	S243.110	Rural production	RPROZ-O3	Retain Objective RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
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FS85.116	Wendover Two Limited	S222.085	Rural production	RPROZ-O3	Retain Objective RPROZ-O3	Oppose	Disallow in part	The objective RPROZ-O3, letter c, should not be retained as there is no rationale that only farming does not compromise land use. It is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.
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FS85.117	Summit Forests New Zealand Limited	S148.048	Rural production	RPROZ-R15	Amend RPROZ-R15 by deleting PER-1 "It is not located on versatile soils" and change "Activity status where compliance not achieved" to "Not Applicable".	Support	Allow	PF Olsen supports SFNZL's submission to delete PER-1, as this does not take into account Policy 4 of the National Policy Statement of Highly Productive Land. According to NPS-HPL, land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities. There is no reason for forestry activity not to be allowed on LUC 1, 2, or 3 land. This should be a decision of the landowner, not the Council.
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FS85.118	Manulife Forest Management (NZ) Ltd	S160.040	Rural production	RPROZ-R15	Amend rule RPROZ-R15 to delete PER-1	Support	Allow	PF Olsen supports Manulife's submission to delete PER-1, as this does not take into account Policy 4 of the National Policy Statement of Highly Productive Land. According to NPS-HPL, land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities. There is no reason for forestry activity not to be allowed on LUC 1, 2, or 3 land. This should be a decision of the landowner, not the Council.
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FS85.119	Summit Forests New Zealand Limited	S148.050	Rural lifestyle	RLZ-R10	Amend RLZ-R10 by deleting PER-1 "It is not located on versatile soils" and change "Activity status where compliance not achieved" to "Not Applicable".	Support	Allow	PF Olsen supports SFNZL's submission to delete PER-1, as this does not take into account Policy 4 of the National Policy Statement of Highly Productive Land. According to NPS-HPL, land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities. There is no reason for forestry activity not to be allowed on LUC 1, 2, or 3 land. This should be a decision of the landowner, not the Council.
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FS85.120

Setar Thirty Six
Limited

S168.123

Rural
lifestyle

RLZ-R10

Retain Rule RLZ-R10

Oppose

Disallow

This submission should be disallowed because PER-1 is inconsistent with Policy 4 of the National Policy Statement of Highly Productive Land. According to NPS-HPL, land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities. There is no reason for forestry activity not to be allowed on LUC 1, 2, or 3 land. This should be a decision of the landowner, not the Council.

FS85.121	Summit Forests New Zealand Limited	S148.051	Horticulture	HZ-R11	Amend HZR11 by deleting PER-1 "It is not located on versatile soils" and change "Activity status where compliance not achieved" to "Not Applicable".	Support	Allow
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PF Olsen supports SFNZL's submission to delete PER-1, as this does not take into account Policy 4 of the National Policy Statement of Highly Productive Land. According to NPS-HPL, land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities. There is no reason for forestry activity not to be allowed on LUC 1, 2, or 3 land (versatile soil). This should be open to the decision of the landowner. Council interference here seems unreasonable and inconsistent with the national policy.

Further, this rule is out of the scope of Regulation 6 of the NES-PF, which sets specifically the topics and situations where Councils can impose more stringent rules.

FS85.122

Two M Investments
Limited

S317.012

Horticulture

HZ-R11

Retain rule HZ-R11.

Oppose

Disallow

PF Olsen
opposes
maintaining
rule RLZ-R10
as is. PER-1
does not take
into account
Policy 4 of the
National Policy
Statement of
Highly
Productive
Land.
According to
NPS-HPL, land-
based primary
production
means
production,
from
agricultural,
pastoral,
horticultural, or
forestry
activities. There
is no reason for
forestry activity
not to be
allowed on
LUC 1, 2, or 3
land (versatile
soil). This
should be
open to the
decision of the
landowner.
Council
interference
here seems
unreasonable
and
inconsistent
with the
national policy.
Further, this

rule is out of the scope of Regulation 6 of the NES-PF, which sets specifically the topics and situations where Councils can impose more stringent rules.

FS85.123

Antony Egerton
and Stefanie
Egerton

S506.022

Horticulture

HZ-R11

Retain rules

Oppose

Disallow

PF Olsen
opposes
maintaining
rule RLZ-R10
as is. PER-1
does not take
into account
Policy 4 of the
National Policy
Statement of
Highly
Productive
Land.
According to
NPS-HPL, land-
based primary
production
means
production,
from
agricultural,
pastoral,
horticultural, or
forestry
activities. There
is no reason for
forestry activity
not to be
allowed on
LUC 1, 2, or 3
land (versatile
soil). This
should be
open to the
decision of the
landowner.
Council
interference
here seems
unreasonable
and
inconsistent
with the
national policy.
Further, this

FS85.124	Summit Forests New Zealand Limited	S148.035	Planning maps	Coastal Environment	Delete any areas of existing plantation forestry from the coastal environment overlay mapping.	Support	Allow	<p>The scope of the rule is out of the scope of the Resource Management Act 1991, and the Department of Conservation forestry activity specifically the tussock and siltation sites.</p> <p>Where Councils have Councils 29A there is more stringent of existing plantation forestry within the Coastal Environment, Outstanding Natural Landscape, or High Natural Character layers. Besides, more stringent rules in these layers will affect current plantation forests with no s 32 consideration or justification for this to occur.</p> <p>Lastly, there needs to be more consistency between the planning maps and the rules PRROZ-O1, PRROZ-O3, PRROZ-O4 and PRROZ-P1.</p>
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FS85.125	Summit Forests New Zealand Limited	S148.031	Planning maps	Outstanding Natural Feature	Delete any areas of existing plantation forestry for the ONF overlay mapping	Support	Allow
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PF Olsen supports changing the planning maps. The plan needs to take into consideration forestry activity as long land use activity and existing use of land as per s 20A. There is no recognition of existent plantation forestry within the Coastal Environment, Outstanding Natural Landscape, or High Natural Character layers. Besides, more stringent rules in these layers will affect current plantation forests with no s 32 consideration or justification for this to occur. Lastly, there needs to be more consistency between the planning maps and the rules PRROZ-O1, PRROZ-O3,

FS85.126

Summit Forests
New Zealand
Limited

S148.030

Planning
maps

Outstanding
Natural
Landscape

Delete any areas of
existing plantation forestry
for the ONL overlay
mapping

Support

Allow

PF Olsen supports changing the planning maps. The plan needs to take into consideration forestry activity as long land use activity and existing use of land as per s 20A. There is no recognition of existent plantation forestry within the Coastal Environment, Outstanding Natural Landscape, or High Natural Character layers. Besides, more stringent rules in these layers will affect current plantation forests with no s 32 consideration or justification for this to occur. Lastly, there needs to be more consistency between the planning maps and the rules PRROZ-O1, PRROZ-O3,

FS85.127	Summit Forests New Zealand Limited	S148.030	Planning maps	Outstanding Natural Landscape	Delete any areas of existing plantation forestry for the ONL overlay mapping	Support	Allow
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PF Olsen supports changing the planning maps. The plan needs to take into consideration forestry activity as long land use activity and existing use of land as per s 20A. There is no recognition of existent plantation forestry within the Coastal Environment, Outstanding Natural Landscape, or High Natural Character layers. Besides, more stringent rules in these layers will affect current plantation forests with no s 32 consideration or justification for this to occur. Lastly, there needs to be more consistency between the planning maps and the rules PRROZ-O1, PRROZ-O3,

FS85.128	Summit Forests New Zealand Limited	S148.031	Planning maps	Outstanding Natural Feature	Delete any areas of existing plantation forestry for the ONF overlay mapping	Support	Allow
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PF Olsen supports changing the planning maps. The plan needs to take into consideration forestry activity as long land use activity and existing use of land as per s 20A. There is no recognition of existent plantation forestry within the Coastal Environment, Outstanding Natural Landscape, or High Natural Character layers. Besides, more stringent rules in these layers will affect current plantation forests with no s 32 consideration or justification for this to occur. Lastly, there needs to be more consistency between the planning maps and the rules PRROZ-O1, PRROZ-O3,

