



DOC-7438392
DOC Reference: CP123

4 September 2023

Proposed Far North District Plan
Far North District Council
Private Bag 752
Kaikohe 0440

Email: pdp@fndc.govt.nz

Attn: District Plan Team

Further Submission on the Proposed Far North District Plan

Please find enclosed a further submission by the Director-General of Conservation in respect of Far North District Council's Proposed District Plan.

Please contact Ashiley Sycamore (RMA Planner) in the first instance if you wish to discuss any of the matters raised in this submission (asycamore@doc.govt.nz or 027 234 4847).

Yours sincerely



Meirene Hardy-Birch
Operations Manager – Kaitia District
Department of Conservation
Te Papa Atawhai

**Form 6: Further submission in support of, or in opposition to,
submission on notified proposed policy statement or plan, change or
variation**

Pursuant to clause 8 of the First Schedule of the Resource Management Act 1991 (the Act)

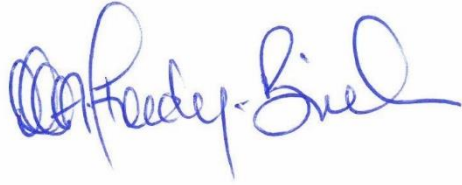
To: Far North District Council (FNDP)

Name of submitter: Penny Nelson, Director-General of Conservation (the D-G)

1. This is a further submission in support of (or in opposition to) a submission on the proposed Far North District Plan (the FNDP):
2. The D-G represents relevant aspects of public interest and has an interest in the FNDP that is greater than the interest of the general public. The D-G has all the powers reasonably necessary to enable the Department of Conservation (DOC) to perform its functions¹. The Conservation Act 1987 (the CA) sets out DOC's functions which include (amongst other things) management of land and natural and historic resources for conservation purposes, preservation so far as is practicable of all indigenous freshwater fisheries, protection of recreational freshwater fisheries and freshwater fish habitats and advocacy for the conservation of natural resources and historic heritage². Section 2 of the CA defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations'*.
3. I have outlined my views on specific submissions in the **attached** table in the required format.
4. I wish to be heard in support of my further submission.
5. If others make a similar submission, I will consider presenting a joint case with them at a hearing.
6. A copy of this submission has been served on the original submitters.

¹ Refer section 53 Conservation Act 1987.

² Conservation Act 1987, section 6.



Meirene Hardy-Birch

Operations Manager

Kaitia District

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation

Date: 4 September 2023

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

Attn: Ashiley Sycamore, RMA Planner

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RMA Shared Services

Department of Conservation

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Hamilton 3240

Submitter	Submission Point	Provision	Submitter Stance	Submitter Relief	D-G Stance and Reason	D-G decision sought
PF Olsen (S91)	S91.010	NFL-R5	Oppose	Delete this rule. Provide permitted activity status to existing plantation forests and associated plantation forest activities. Remove any areas of plantation forest from the Outstanding Natural Landscapes / Features overlay mapping.	Oppose in part The rule is supported for retention by the D-G. The submitter's proposed approach to mapping is also opposed.	Allow FS404.001
New Zealand Agricultural Aviation Association (S182)	S182.001	Definition	Add	Add a new definition: <u>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 biosecurity purposes including stock management, and the application of fertiliser, agrichemicals, vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed-wing aeroplanes, helicopters,</u>	Support The D-G supports the definition and wishes to be involved in any further drafting through this process. The D-G seeks clarity that the use of aircraft for conservation/DOC operational purposes will be provided for.	Allow FS404.002

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				<u>and unmanned aerial vehicles (UAV's).</u>		
S182	S182.002	Definitions	Add	Add a new definition: <u>Aircraft;</u> <u>Means any machine that can derive support in the atmosphere from the reaction of the air otherwise than by the reactions of the air against the surface of the earth.</u>	Support The D-G supports the definition and wishes to be involved in any further drafting through this process. The D-G seeks clarity that the use of aircraft for conservation/DOC operational purposes will be provided for.	Allow FS404.097
S182	S182.003	Definitions	Support in part	Add to the definition: <u>..including the use of agricultural aviation; ..</u> <u>Biosecurity</u>	Support The D-G supports the definition and wishes to be involved in any further drafting through this process. The D-G seeks clarity that the use of aircraft for conservation/DOC operational purposes will be provided for.	Allow FS404.003
S182	S182.016	IB-R1	Support in part	The addition of new clause: <u>14. the clearance of regenerating indigenous vegetation for the</u>	Oppose The relief seeks to allow unfettered removal of potentially significant vegetation and significant habitat	Disallow FS404.004

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				<p><u>maintenance of improved pasture as sought above</u></p> <p>Delete part 10</p> <p>10. The removal or clearance from land which was previously cleared and the indigenous vegetation to be cleared is less than 10 years old;</p>	of indigenous fauna, inconsistent with section 6(c) of the Act.	
Tane's Tree Trust Totara Working Group (S158)	S157.001 to S157.004	General	Add	Harvests under MPI approved provisions of Part 3A of the Forests Act (e.g., SFMPs) are attributed Permitted Activity status throughout the district including within Significant Natural Areas and areas designated as Outstanding Landscapes.	<p>Oppose</p> <p>The D-G is concerned that permitted activity or other rules of this nature would rely on the assessment of effects on indigenous biodiversity that has been undertaken under a plan or permit under the Forests Act 1949. The plans or permits are approved or issued by the Ministry of Primary Industries (MPI).</p> <p>When MPI consider these plans and permits, the consideration</p>	<p>Disallow</p> <p>FS404.005</p> <p>FS404.009</p> <p>FS404.010</p> <p>FS404.010</p>

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					over what is 'sustainable' under the Forests Act 1949, is different to 'sustainable management' under the Resource Management Act. This means that when MPI are considering any permit or plan, the framework for decision making is different to what should be considered under the RMA. It is inappropriate to incorporate this different assessment framework in the district plan.	
Northern Rescue Helicopter Limited (S281)	S281.001	NOISE	Clarify	Would like the emergency rescue helicopters to be unconstrained and exempt from any noise rules. Review the proposed rule.	Support in part The D-G wants to be involved in review of this rule, including to explicitly provide for conservation or DOC operational activities that require the use of helicopters and other aircraft.	Allow FS404.006
Northland Regional Council (S359)	S359.004	General	Amend	Amend the plan to have regard to the National Policy Statement Highly Productive Land 2022 and the National Policy Statement Indigenous Biodiversity 2023 (NPS-IB).	Support in part The D-G notes the submitter's relief has been summarised as requesting the plan be reviewed to 'have regard' to the listed national policy statements. Pursuant to	Allow FS404.007

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					section 75(3)(a) of the Act the requirement is to 'give effect' to those documents. The relief is otherwise supported.	
Northland Federated Farmers of New Zealand (S421)	S421.180	General	Oppose	Federated Farmers seeks that the areas of high natural character are deleted from this section as the coastal environment, outstanding natural character and indigenous biodiversity rules are consistent with section 6(a) of the Resource Management Act 1991 in protecting these areas from inappropriate subdivision and development. Without the high natural character layer, the District Plan still meets the Council's obligations under the New Zealand Coastal Policy Statement as well as the Northland Regional Policy Statement.	Oppose The relief is inconsistent with section 6(a) of the Act and the relevant National Policy Statements.	Disallow FS404.008
Transpower New Zealand Limited (S454)	S454.015 S454.018	Definitions	Amend	Amend the definition as follows:	Oppose in part	Disallow FS404..012-.015

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				<p>BIODIVERSITY OFFSETS are measurable outcomes resulting from actions designed to provide new positive effects to counter residual adverse effects of subdivision, land use and development on indigenous biodiversity.</p> <p>Delete the biodiversity offsetting principles listed in the notified FNDP definition.</p> <p>ENVIRONMENTAL BIODIVERSITY COMPENSATION consists of measurable outcomes resulting from actions designed to provide new positive effects to counter residual adverse effects of subdivision, land use and development on indigenous biodiversity.</p> <p>Delete the environmental biodiversity compensation</p>	<p>The principles are aligned with Appendices 3 and 4 of the NPS-IB, and therefore warrant inclusion in the FNDP. The D-G accepts inclusion in a policy and/or appendices may be the more appropriate place but opposes their deletion from the definitions in the absence of such drafting.</p>	

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				principles listed in the notified FNDP definition.		
S454	S454.043 S454.044	I-P2 I-P3	Amend	Exclude the National Grid from policy I-P2 and I-P3 and provide a National Grid specific policy as set out above in the submission point for I-P2.	Oppose The relief is inconsistent with, s6(b), s6(c) of the Act and the cascade of planning documents including but not limited to the NZCPS, NPS-IB, and the Northland Regional Policy Statement 2016.	Disallow FS404.016-.017
S454	S454.083 S454.084 S454.85 S454.086 S454.088 S454.089 S454.090 S454.091 S454.092 S454.093	IB-P2 IB-P3 IB-P10 NATC-O2 NATC-P4 NFL-O2 NFL-P2 NFL-P3	Amend	The submitter seeks consequential amendments to their proposed I-P2, inserting the clause <u>“subject to Policy I-Px”</u> .	Oppose As the D-G opposes the submitter’s relief for I-P2, the consequential amendments are also opposed.	Disallow FS404.018-.027
John Andrew Riddell (S431)	S431.027 S431.029 S431.030 S431.031 S431.032	CE-04 CE-P5 CE-P6 CE-P7 CE-P10	Amend	Add a further objective CE-04 that is the same as objective 10.3.6 in the operative Plan. Amend policies CE-P5 and CE-P6 so both policies commence 'Provide for' and	Support The D-G generally supports the relief as improving the completeness and readability of the CE provisions.	Allow FS404.028-.032

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				<p>not 'Enable'; and amend clause b in both policies by identifying what characteristics and qualities are not to be compromised. (Is it the characteristics and qualities of the local coastal environment?)</p> <p>Add a further clause to policy CE-P10: any cumulative effects</p> <p>Insert two further policies in the Coastal Environment chapter that are reproductions of policies 4.6.1 and 5.1.2 of the Regional Policy Statement.</p>	<p>The relief will better implement the relevant higher order documents, such as the NZCPS.</p>	
S431	S431.033 S431.034	Add Policies	Amend	<p>Insert two further policies in the Coastal Environment chapter that are reproductions of policies 4.6.1 and 5.1.2 of the Regional Policy Statement.</p>	<p>Support</p> <p>The D-G supports the clear and directive drafting in RPS policies 4.6.1 and 5.1.2. These give effect to the NZCPS and are appropriate for inclusion the FNDP in the</p>	<p>Allow</p> <p>FS404.033-.034</p>

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					absence of alternative drafting to address these issues.	
S431	S431.047	General/mapping	Amend	Extend the coastal environment boundary at Kaimaumu Wetland as set out in the relevant Environment Court decision.	<p>Support</p> <p>The D-G supports mapping the coastal environment boundary as set out in the relevant Environment Court decision³. As the submitter points out Policy CE-P1 does not preclude extending the coastal environment where application of the assessment criteria in APP-1 justifies it, regardless of whether it is so identified in the Regional Policy Statement or not.</p> <p>The D-G generally supports evidence-based mapping of the coastal environment, other zones and overlays.</p> <p>The D-G supports evaluating similar changes should they arise through this process.</p>	<p>Allow</p> <p>FS404.035</p>

³ See [2019] NZEnvC 028 A Burgoyne & Te Taumatua o Ngati Kuri Research Unit v Northland Regional Council

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S431	S431.047	Subdivision	Add	<p>Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <p>...</p> <p>measures to mitigate and adapt to climate change</p>	<p>Support</p> <p>The D-G supports provision for assessing measures to mitigate and adapt to climate change in considering subdivision applications.</p>	<p>Allow</p> <p>FS404.036</p>
S431	S431.086	SUB-R6	Amend	<p>Revise rule SUB-R6, environmental benefit, and its supporting policies to ensure that</p> <ul style="list-style-type: none"> • all of the ecological feature is protected, • the ecological significance of the feature is considered, • any additional lots have a suitable house site at least 20 metres away from any protected ecological feature, 	<p>Support</p> <p>The subdivision provisions are generally incomplete in the notified FNDP. The relief is necessary and appropriate to achieve the purpose of the Act.</p>	<p>Allow</p> <p>FS404.037</p>

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				<ul style="list-style-type: none"> • more details are provided on the required content and objectives of an ecological management plan (including how the management actions will be monitored and reported on), • sprawling or sporadic subdivision and development is avoided, and • natural character is protected and preserved. 		
S431	S431.090 S431.093 S431.94 to S431.101 S431.102	IB-P1 IB-P2 IB-P3 IB-P5	Oppose	Seeks the following decisions with respect to the Ecosystems and Indigenous Biodiversity provisions (or changes to wording and/or provisions to the same effect and any consequential changes): (a) Replace policies IB-P1, IB-P2 and IB-P3 with a	Support in part The D-G supports the clearer and directive drafting in RPS policy 4.4.1 replacing proposed policies IB-P1 – P3, with the caveat that they also give effect to the NPS-IB, or that Policy Statement is otherwise implemented.	Allow subject to D-G’s reasons. FS404.038- .048

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				<p>reproduced policy 4.4.1 of the Regional Policy Statement.</p> <p>(b) Add a further policy that recognises that not all significant natural areas will be mapped and that such unmapped areas are to have, as far as practicable, the same level of protection in the proposed Plan as mapped Significant Natural Areas.</p> <p>(c) Reproduce operative Plan policies 12.2.4.1, 12.2.4.3, 12.2.4.5, 12.2.4.10, 12.2.4.11, 12.2.4.12, 12.2.4.13 and 12.2.4.14 in the policy section of the Ecosystems and Indigenous Biodiversity chapter.</p> <p>(d) Amend clause b of policy IB-P5 so that it sets the policy test for restrictions on primary production as whether they are necessary for protection and enhancement of indigenous biodiversity.</p>	<p>Clause (b) of the submitter’s relief is appropriate and necessary to give effect to the NPS-IB and to achieve the purpose of the Act.</p> <p>Clause (c) of the submitter’s relief seeks to reproduce several operative Indigenous flora and fauna policies. The D-G considers 12.2.4.1 and 12.2.4.3 to be reflective of an earlier planning framework (for instance the explicit reference to Part 2 of the Act in 12.2.4.1), postdated by national direction such as the NPS-IB. Aspects of these policies remain useful, but they need an update. The D-G supports the intent of including these policies but retains scope to provide new drafting in this process.</p> <p>12.2.4.10 and 12.2.4.11 are appropriate and necessary in the FND context and are supported for inclusion in the proposed plan by the D-G. 12.2.4.12, 12.2.3.13 and 12.2.14 are considered well aligned</p>	

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					to the higher order planning framework and reflect good practice.	
S431	S431.103	IB-R1	Amend	Delete items 2 and 12 of PER-1 of rule IB-R1.	Support Items 2 and 12 are inappropriately permissive.	Allow FS404.049
S431	S431.104 S431.105 S431.106 S431.107 S431.108	IB-R1	Amend	Amend the commencement of PER-1 in rule IB-R1 so that it states: The pruning, trimming or clearance is the minimum necessary and is for one of the following Qualify item 6, clearance around buildings, of PER-1 of rule IB-R1 so that it applies to lawfully established existing buildings. Qualify item 7, clearance for single residential unit, of PER-1 of rule IB-R1 so that it does not apply to any clearance within a Significant Natural Area. Amend PER-1 of IB-R3, clearance within a Significant Natural Area, so that it	Support The proposed qualifiers and thresholds strike an appropriate balance between protecting indigenous biodiversity values and providing for sustainable use.	Allow FS404.050-.054

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				provides for a total clearance of no more than 100 square metres in any 10-year period. Amend clause 2 of PER-2 of rule IB-R3 so that it provides for a total clearance of no more than 100 square metres in any 10 year period.		
S431	S431.149 S431.150	Assessment criterion	Add	In all relevant policies on managing land use and subdivision, insert a further assessment criterion: any cumulative effects	Support The FNDC should have policy direction for assessment of cumulative effects.	Allow FS404.055-.056
S431	S431.156	Matters of discretion in the RPZ, RLZ and RRZ	Add	The addition of further matters of discretion for all restricted discretionary activities in the Rural Production, Rural Lifestyle and Rural Residential zones: <ul style="list-style-type: none"> • effects on natural character • effects on indigenous biodiversity • effects on historic heritage and cultural values 	Support It is appropriate for FNDC to have discretion to assess the effects of climate change and the listed matters of national importance.	Allow FS404.057

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				<ul style="list-style-type: none"> effects on adaptation to and mitigation of climate change 		
S431	S431.168	General Objective and Policies	Add	In all objectives and policies where there is reference to protection for current and future generations, add “and intrinsic and natural values”.	Support Relief is consistent with the purpose of the Act.	Allow FS404.058
S431	S431.169	I-P13	Amend	Qualify Infrastructure policy I-P13 by stating that it is subject to policies I-P2, I-P3 and I-P6.	Support Improves clarity for plan users and subject to the drafting of I-P2, I-P3 and I-P6 will better align with the higher planning documents.	Allow FS404.059
S431	S431.170	Infrastructure provisions	Oppose	Revise all infrastructure rules to provide for more stringent requirements apply where any of the matters of national importance in section 6 of the Act apply.	Support in part The D-G supports revision of these policies to better recognise and provide for the matters of national importance in section 6 of the Act, subject to the detailed drafting.	Allow FS404.060
Northland Fish and Game Council (S436)	S436.038	NAT-S2	Amend	Amend the rule as follows: Any earthworks or indigenous vegetation on a site within wetland, lake and river margins clearance must:	Oppose in part The D-G considers both the notified standard and the relief to be overly permissive for earthworks or vegetation clearance	Disallow FS404.061

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				<ol style="list-style-type: none"> 1. not exceed a total area of 400 500m² or <u>10% of the area of the natural wetland, whichever is smaller;</u> for 10 years from the notification of the District Plan, unless a control in 5. below applies; 2. not exceed a cut height or fill depth of 1m; 3. screen exposed faces; and 4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and CE-S3 Earthworks or indigenous vegetation clearance. 	<p>within a wetland and wishes to be involved in any re-drafting of the standard.</p>	

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				Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.		
Kapiro Conservation Trust (S442)	S442.001 – S442.020	IB provisions SUB provisions NATC provisions	Oppose/Amend		Support The relief seeks to achieve the purpose of the Act and is consistent with the intent of the D-G's primary submission.	Allow FS404.062- .081
Top Energy (S483)	S483.079	REG-O3	Amend	<u>Adverse effects from renewable energy generation activities on values mapped in the Plan are managed. Renewable electricity generation activities are located and designed to avoid and minimise adverse effects on areas with historical, cultural, environmental and coastal values.</u>	Oppose The mapping is not complete in the notified FNDP, for example, SNAs have been identified but not scheduled and areas of the coastal environment have been omitted. It is appropriate that effects on these values are assessed, and an avoidance directive is applied where required by the higher order planning instruments.	Disallow FS404.082
S438	S438.085	REG-P5	Amend		Oppose	Disallow

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					The relief is inconsistent with the s6 of the Act and higher order planning documents, including the NZCPS.	S404.083
S438	S438.06	REG-P6	Amend		Oppose The relief is inconsistent with the s6 of the Act and higher order planning documents, including the NZCPS. It is also noted that significant effects are by inherently “more than minor”.	Disallow FS404.084
Royal Forest and Bird Society of New Zealand (S511)	S511.032	SD-EP-05	Support in part	Amend <i>...The natural character of the coastal environment, waterbodies and their margins are preserved, and outstanding natural features and landscapes are identified and managed to ensure their long-term protection for future generations</i>	Support The relief is consistent with section 6(a) of the Act.	Allow FS404.085
S511	S511.034	New SD-EP-0X	Add	Add	Support	Allow FS404.086

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				<u>Indigenous Biodiversity is maintained.</u>	The relief is consistent section 31 of the Act.	
S511	S511.018	Part 3 – Area Specific Matters	Support in part	..	Support Adds clarity for plan users.	Allow FS404.087
S511	S511.026	Overview- Natural Environment	Support in part	Amend to include the issues set out: In terms of indigenous biodiversity, Forest & Bird considers that the issues include: <ul style="list-style-type: none"> • the risk of species reaching threat status and of those already threatened becoming more so; • the need to increase and enhance indigenous biodiversity: o for habitat benefits to native species; o for the significant contribution native trees and wetlands provide as carbon sinks; and o for resilience in a changing climate; • recognising that Northland is a strong hold for some 	Support The issues listed are pertinent. They should be included in the overview.	Allow FS404.088

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				species and should remain so; <ul style="list-style-type: none"> that development pressures are resulting in the loss of indigenous biodiversity including through incremental vegetation clearance, the effects of introduced species and potential to spread kauri dieback. 		
S511	S511.040 S511.043 S511.041 S511.042	I-P2 I-P3	Support in part		Support If policies addressing indigenous biodiversity remain in this chapter, the D-G supports proposed approach, including narrowing the application RSI and the directive to avoid on NZCPS Policy 11(a) values.	Allow FS404.089-.092
S511	S511.054	IB-02	Oppose	Amend <i>The extent and diversity of Indigenous biodiversity across the district is managed to maintained. its extent and diversity in a way that provides for the social,</i>	Support The relief is consistent with section 31 of the Act.	Allow FS404.093

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				economic and cultural well-being of people and communities.		
S511	S511.058	IB-P2	Oppose in part	Amend to give full effect to RPS and the NZCPS, policy 11(a) and (b)	Support Support the relief for the reasons given in the Forest and Bird primary submission.	Allow FS404.094
S511	S511.059	IB-P3	Oppose in part	Amend to give full effect to the RPS. Policy 4.4.1 for indigenous biodiversity outside of the coastal environment.	Support As stated in the Forest and Bird primary submission the policy must give full effect to RPS policy 4.4.1 for indigenous biodiversity outside of the coastal environment.	Allow FS404.095
S511	S511.061	IB-P5	Oppose	Delete in the first instance, if not deleted then Amen 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:	Support The drafting offered by Forest and Bird is clearer than the notified version.	Allow FS404.096

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				<p>a) Does not impose unreasonable restrictions on <u>Allows</u> for existing primary production activities, to continue particularly on <u>highly versatile soils where the Significant Natural Areas' values are protected and indigenous biodiversity values are maintained;</u>...</p>		