

DDPR_feedback_0424s	
Name	Heather Arnold
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Email	heather.arnold@pfolsen.com
Response Date	Aug 31 22 01:35:51 pm
Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on
	Part 1 - Introduction and General Provisions
Q2	In general, to what extent do you support the contents of this chapter?
	Neutral
Q3	Objective/Policy/Rule/Standard
	Definitions - carbon forestry
Q4	Feedback/Comments
	<p>1.1 Carbon forestry</p> <p>1.1.1 The definition states: Carbon forestry means a forest of at least 1ha (to be measured cumulatively per site), whether derived from indigenous or introduced species, established or used for the purpose of generation of carbon credits and/or sequestering carbon. It does not include:</p> <ol style="list-style-type: none"> 1. plantation forestry; 2. earthworks associated with tracking or establishing the activity; 3. shelterbelts less than 30m wide; 4. forest species in urban areas; 5. trees grown for fruit or nuts; or 6. ecological restoration of species indigenous to the ecological district <p>1.1.2 The definition is unclear, as it references a "site". Is this a legal title? An accumulation of legal titles in the same ownership? Please clarify.</p> <p>1.1.3 Plantation forestry is a series of activities as defined by the NES-PF. In this context (akin to "shelterbelts" and "forest species" it is the plantation forest that should be excluded from this definition, not the activity of plantation forestry.</p>
Q5	Objective/Policy/Rule/Standard
	Definitions - Flood tolerant activities and land use
Q6	Feedback/Comments
	<p>1.2 Flood tolerant activities and land use</p> <p>1.2.1 The definition states: Flood tolerant activities and land use means activities and land use that will not be impacted in a flood event, and that are designed to easily recover in a flood event and includes:</p> <ol style="list-style-type: none"> 1. recreation and leisure activities and organised sports and recreation activities, including sport fields, courts or associated open space facilities (including structures but excluding buildings); 2. public amenities, including bicycle stands, lighting, park benches, shelters, rubbish bins, toilet facilities; 3. forestry; 4. quarrying activities and mining activities; 5. temporary events; 6. at grade parking and loading areas; and 7. horticulture and viticulture. <p>1.2.2 Forests will be impacted in flood events and would not necessarily easily recover in a flood event.</p> <p>1.2.3 Please reconsider this in light of the plan provisions.</p>
Q7	Objective/Policy/Rule/Standard
	Definitions - Plantation Forest, Plantation Forestry, Forest or Forestry
Q8	Feedback/Comments
	1.3 Plantation Forest, Plantation Forestry, Forest or Forestry

	<p>1.3.1 None of these terms are defined in the draft plan. The National Environmental Standards for Plantation Forestry define plantation forestry. Plantation Forestry should be defined in accordance with the NES-PF, and consideration given to the other terms which are all used in the draft plan.</p> <p>1.3.2 Add the following definition and reference to the National Environmental Standards for Plantation Forestry: Plantation forest or plantation forestry means a forest deliberately established for commercial purposes, being—</p> <ul style="list-style-type: none"> (a) at least 1 ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and (b) includes all associated forestry infrastructure; but (c) does not include— <ul style="list-style-type: none"> (i) a shelter belt of forest species, where the tree crown cover has, or is likely to have, an average width of less than 30 m; or (ii) forest species in urban areas; or (iii) nurseries and seed orchards; or (iv) trees grown for fruit or nuts; or (v) long-term ecological restoration planting of forest species; or (vi) willows and poplars space planted for soil conservation purposes
Q9	Objective/Policy/Rule/Standard
Q10	Feedback/Comments
Q11	Supporting documents?
	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/8149740cee8ed22fc91ca24bd5a12238f2e5122d/original/1661909732/92c9171dfad63cb0e98a907056ba1187_2022_08_31_-_Waitaki_District_Plan_Draft_-_PF_Olsen_Comment.pdf?1661909732
Q12	If you need more space, or have other general comments, please leave them here



30 August 2022

Draft District Plan Feedback
Waitaki District Council
Private Bag 50058
OAMARU 9444

Dear Sir/Madam

Comments on the Draft Waitaki District Plan

Thank you for the opportunity to comment on the Draft Waitaki District Plan.

1. Definitions

1.1 Carbon forestry

1.1.1 The definition states:

Carbon forestry means a forest of at least 1ha (to be measured cumulatively per site), whether derived from indigenous or introduced species, established or used for the purpose of generation of carbon credits and/or sequestering carbon.

It does not include:

1. *plantation forestry;*
2. *earthworks associated with tracking or establishing the activity;*
3. *shelterbelts less than 30m wide;*
4. *forest species in urban areas;*
5. *trees grown for fruit or nuts; or*
6. *ecological restoration of species indigenous to the ecological district*

1.1.2 The definition is unclear, as it references a “site”. Is this a legal title? An accumulation of legal titles in the same ownership? Please clarify.

1.1.3 Plantation forestry is a series of activities as defined by the NES-PF. In this context (akin to “shelterbelts” and “forest species” it is the plantation forest that should be excluded from this definition, not the activity of plantation forestry.

1.2 Flood tolerant activities and land use

1.2.1 The definition states: **Flood tolerant activities and land use** means activities and land use that will not be impacted in a flood event, and that are designed to easily recover in a flood event and includes:

1. recreation and leisure activities and organised sports and recreation activities, including sport fields, courts or associated open space facilities (including structures but excluding buildings);
2. public amenities, including bicycle stands, lighting, park benches, shelters, rubbish bins, toilet facilities;
3. forestry;
4. quarrying activities and mining activities;
5. temporary events;
6. at grade parking and loading areas; and
7. horticulture and viticulture.

1.2.2 Forests will be impacted in flood events and would not necessarily easily recover in a flood event.

1.2.3 Please reconsider this in light of the plan provisions.

1.3 Plantation Forest, Plantation Forestry, Forest or Forestry

1.3.1 None of these terms are defined in the draft plan. The National Environmental Standards for Plantation Forestry define plantation forestry. Plantation Forestry should be defined in accordance with the NES-PF, and consideration given to the other terms which are all used in the draft plan.

1.3.2 Add the following definition and reference to the National Environmental Standards for Plantation Forestry:

Plantation forest or plantation forestry means a forest deliberately established for commercial purposes, being—

- (a) at least 1 ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted; and
- (b) includes all associated forestry infrastructure; but
- (c) does not include—
 - (i) a shelter belt of forest species, where the tree crown cover has, or is likely to have, an average width of less than 30 m; or
 - (ii) forest species in urban areas; or
 - (iii) nurseries and seed orchards; or
 - (iv) trees grown for fruit or nuts; or
 - (v) long-term ecological restoration planting of forest species; or
 - (vi) willows and poplars space planted for soil conservation purposes

2. Historical and Cultural Values

2.1 Policy SASM-P5 – Protection of integrity of tuhituhi nehera (rock art)

2.1.1 The policy states:

SASM-P5	Protection of integrity of tuhituhi nehera
	Avoid the following activities on, or in close proximity to, limestone outcrops; <ol style="list-style-type: none">1. agricultural intensification; and2. plantation forestry, unless any adverse effects on the integrity of tuhituhi nehera from disturbance of land and vegetation and changes in the water table, soil water environment and air moisture are avoided.

2.1.2 The policy is problematic as there is no explanation as to the meaning of “in close proximity” and there is no justification of the application of the policy to apply to all limestone outcrops. The policy grandparents existing agricultural land use to the detriment of other primary production industries.

2.1.3 The policy should be focussed on the presence of tuhituhi nehera (rock art) not on all limestone outcrops.

2.1.4 Should there be any need based on a cost benefit analysis and environmental impact to restrict the presence of plantation forestry, this should be a restriction of one tree length (35 - 40 metres), any further control is not justified as there would not be any impact from plantation forestry.

2.1.5 Please review the policy to provide clarity of application and limit its application to areas of tuhituhi nehera (rock art) not all limestone outcrops.

3. Ecosystems and Indigenous Biodiversity

3.1 Permitted Indigenous vegetation clearance rule

3.1.1 ECO-R1 – Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED 6 – Significant Natural Areas.

3.1.2 Rule PER-6 states: *The indigenous vegetation clearance is part of the understory of a plantation forest and is incidental to permitted or otherwise authorised plantation forest harvesting.*

3.1.3 This rule is provided for in the National Environmental Standards for Plantation Forestry (NES-PF)– regulation 93 as a permitted activity.

3.1.4 Delete rule PER-6 and add an advice note to refer to the NES-PF.

- 3.1.5 ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas.
- 3.1.6 Rule PER-2 states: *The width, length and materials used are the same to that which existed prior to the repair and maintenance being required.*
- 3.1.7 If the permitted activity standard cannot be met, the activity defaults to non-complying.
- 3.1.8 The permitted activity standard should not restrict the materials to be used, as there have been significant advances in earthworking technology through the use of geotextiles, gabions and retaining methods for example, which add stability to the earthworks.
- 3.1.9 Delete the reference to the materials being the same.
- 3.1.10 If the permitted activity standard cannot be met, the activity should be a discretionary activity (either restricted or full)
- 3.1.11 ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas.
- 3.1.12 Rule PER-3 states: *Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area.*
- 3.1.13 No earth working activity will be able to comply with this performance standard. It is not possible to prevent all discharges.
- 3.1.14 Replace the word “prevent” with “minimise”.

- 3.2 **Restricted discretionary and Non-complying rules for plantation forestry**
- 3.2.1 ECO-R4 – Exotic plantation forestry, agricultural intensification, quarrying or mining activities adjacent to a Significant Natural Area listed in SCHED6 – Significant Natural Areas
- 3.2.2 It is a restricted discretionary activity for plantation forestry > 100 metres from a SCHED6 Significant Natural Area and a non-complying activity < 100 metres from a SCHED6 Significant Natural Area.
- 3.2.3 This rule therefore makes plantation forestry either discretionary or non-complying throughout the Waitaki District (and other rules prohibit it).
- 3.2.4 There is no justification for this rule under NES-PF regulation 6(2) – Plan rules may be more stringent than the NES-PF for matters of national importance. Plantation forest is a legitimate primary landuse, as is agriculture. It is not identified as a particular issue in relations to SNA’s in the plan of any more importance or relevance than pastoral farming.
- 3.2.5 Should there be any need based on a cost benefit analysis and environmental impact to restrict the presence of plantation forestry adjacent to SNA’s, this should be a restriction

of one tree length (35 - 40 metres), any further control is not justified as there would not be any impact from plantation forestry that could not be appropriately managed.

3.2.6 Delete this rule.

3.3 Prohibited rules for Plantation Forestry

3.3.1 ECO-R7 - Planting species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas is a prohibited activity

3.3.2 This rule is not enforceable. Wilding trees can come from a variety of sources, not solely from planting trees. It unfairly targets planting trees. The management of wilding conifers is a matter for Regional Pest Management Plans.

3.3.3 Delete this rule.

3.4 ECO standards

3.4.1 ECO-S4 establishes the locations and types of indigenous vegetation that can be cleared in areas not identified as SNA's. The limits are prohibitive to any primary land use. The definitions are too broad and will result in a significant number of resource consents being required for general land use practices.

3.4.2 There are many examples where manuka, coprosma, matagori etc are spreading over farmland as stock don't eat it. There should be an allowance to clear vegetation that stock does not eat, that has established over a specified timeframe (e.g. 20 years).

3.4.3 Increase the allowances to ensure practical and appropriate controls.

4. Natural Features and Landscapes

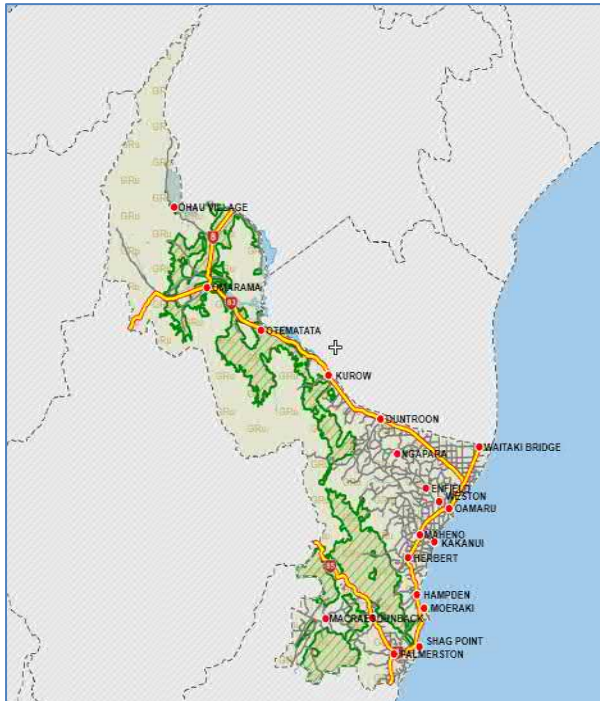
4.1 NFL-R9 – Plantation forestry within or on a Significant Natural Feature or Rural Scenic Landscape.

4.1.1 The Rural Scenic Landscape applies to approximately half of the General Rural zoned land in Waitaki that has not been identified as Outstanding Natural Landscape. Plantation forestry is a controlled activity in the Rural Scenic Landscape zone. "Rural scenic landscape" is not defined in the plan but appears to be an arbitrary provision that grandparents one type of land use over another, considered to be a "working" landscape. Plantation forestry is equally a working landscape.

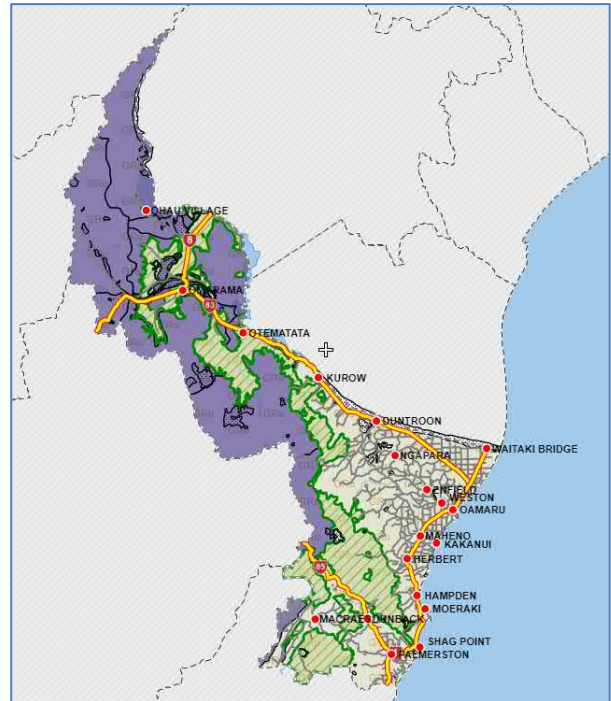
4.1.2 The Outstanding Natural Landscape zone in Waitaki equates to approximately 40% of the district, with plantation forestry prohibited in the zone.

4.1.3 There is no justification for any controls on plantation forestry in the Rural Scenic Landscape.

4.1.4 Delete NFL-R9.



Green hatched area = Rural Scenic Landscape



Purple = Outstanding Natural Landscape
Black outline and dotted areas = Outstanding Natural Feature

4.2 NFL-R15 - Planting species that can result in wilding conifers on or within Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes is a prohibited activity

4.2.1 This rule is not enforceable. Wilding trees can come from a variety of sources, not solely from planting trees. It unfairly targets planting trees. The management of wilding conifers is a matter for Regional Pest Management Plans.

5. Coastal Environment

5.1 The Coastal Environment has been identified as an area where plantation forestry is to be discouraged. This should only apply to new plantation forest.

5.2 The Plan needs to guide users as to which rules are more stringent than the NES-PF and which activities are covered by the NES-PF. It also needs to clarify if existing use rights apply for established plantation forest.

6. Earthworks

- 6.1 The Plan needs to guide users as to which rules are more stringent than the NES-PF and which earthworks activities are covered by the NES-PF.
- 6.2 With the exception of the matters provided by NES-PF regulation 6, all earthworks in relation to plantation forestry should be referred to the NES-PF.

7. National Environmental Standards for Plantation Forestry

7.1 Regulation 6 of the NES-PF provides for rules to be more stringent than the NES-PF to:

1. give effect to:
 - An objective developed to give effect to the NPS-FM
 - Any of policies 11, 13, 15, and 22 of the NZCPS
2. recognise and provide for the protection of:
 - Outstanding Natural Features and Landscapes
 - Significant Natural Area
3. manage:
 - Activities in karst geology

7.1.1 The plan should provide clear guidance to users as to which rules are more stringent than the NES-PF.

I trust these comments will guide the development of the Waitaki District Plan and I am happy to answer any questions.

Yours sincerely,

PF OLSEN LTD



Heather Arnold
Environmental Manager

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	Response Date	Aug 31 22 01:38:21 pm
	Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on	
	Sites and Areas of Significance to Māori	
Q2	In general, to what extent do you support the contents of this chapter?	
	Neutral	
Q3	Objective/Policy/Rule/Standard reference:	
	Policy SASM-P5 – Protection of integrity of tuhituhi nehera (rock art)	
Q4	Feedback/Comments	
	2.1 Policy SASM-P5 – Protection of integrity of tuhituhi nehera (rock art) 2.1.1 The policy states: (refer to the plan) 2.1.2 The policy is problematic as there is no explanation as to the meaning of “in close proximity” and there is no justification of the application of the policy to apply to all limestone outcrops. The policy grandparents existing agricultural land use to the detriment of other primary production industries. 2.1.3 The policy should be focussed on the presence of tuhituhi nehera (rock art) not on all limestone outcrops. 2.1.4 Should there be any need based on a cost benefit analysis and environmental impact to restrict the presence of plantation forestry, this should be a restriction of one tree length (35 - 40 metres), any further control is not justified as there would not be any impact from plantation forestry. 2.1.5 Please review the policy to provide clarity of application and limit its application to areas of tuhituhi nehera (rock art) not all limestone outcrops.	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	

DDPR_feedback_0426s	
Name	Heather Arnold
Organisation	PF OLSEN LIMITED - 9429037560669
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Response Date	Aug 31 22 01:41:32 pm
Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on
	Ecosystems and Indigenous Biodiversity
Q2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q3	Objective/Policy/Rule/Standard
	ECO-R1 – Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED 6 – Significant Natural Areas
Q4	Feedback/Comments
	<p>3.1 Permitted Indigenous vegetation clearance rule</p> <p>3.1.1 ECO-R1 – Indigenous vegetation clearance outside of a Significant Natural Area listed in SCHED 6 – Significant Natural Areas.</p> <p>3.1.2 Rule PER-6 states: The indigenous vegetation clearance is part of the understory of a plantation forest and is incidental to permitted or otherwise authorised plantation forest harvesting.</p> <p>3.1.3 This rule is provided for in the National Environmental Standards for Plantation Forestry (NES-PF)– regulation 93 as a permitted activity.</p> <p>3.1.4 Delete rule PER-6 and add an advice note to refer to the NES-PF.</p>
Q5	Objective/Policy/Rule/Standard
	ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas
Q6	Feedback/Comments
	<p>3.1.5 ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas.</p> <p>3.1.6 Rule PER-2 states: The width, length and materials used are the same to that which existed prior to the repair and maintenance being required.</p> <p>3.1.7 If the permitted activity standard cannot be met, the activity defaults to non-complying.</p> <p>3.1.8 The permitted activity standard should not restrict the materials to be used, as there have been significant advances in earthworking technology through the use of geotextiles, gabions and retaining methods for example, which add stability to the earthworks.</p> <p>3.1.9 Delete the reference to the materials being the same.</p> <p>3.1.10 If the permitted activity standard cannot be met, the activity should be a discretionary activity (either restricted or full)</p>
Q7	Objective/Policy/Rule/Standard
	ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas.
Q8	Feedback/Comments
	<p>3.1.11 ECO-R3 – Earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas.</p> <p>3.1.12 Rule PER-3 states: Silt and sediment control measures are in place to prevent discharge of silt and/or sediment into the Significant Natural Area.</p> <p>3.1.13 No earth working activity will be able to comply with this performance standard. It is not possible to prevent all discharges.</p> <p>3.1.14 Replace the word “prevent” with “minimise”.</p>
Q9	Objective/Policy/Rule/Standard
	ECO-R4 – Exotic plantation forestry, agricultural intensification, quarrying or mining activities adjacent to a Significant Natural Area listed in SCHED6 – Significant Natural Areas
Q10	Feedback/Comments
	Restricted discretionary and Non-complying rules for plantation forestry

	<p>3.2.1 ECO-R4 – Exotic plantation forestry, agricultural intensification, quarrying or mining activities adjacent to a Significant Natural Area listed in SCHED6 – Significant Natural Areas</p> <p>3.2.2 It is a restricted discretionary activity for plantation forestry > 100 metres from a SCHED6 Significant Natural Area and a non-complying activity < 100 metres from a SCHED6 Significant Natural Area.</p> <p>3.2.3 This rule therefore makes plantation forestry either discretionary or non-complying throughout the Waitaki District (and other rules prohibit it).</p> <p>3.2.4 There is no justification for this rule under NES-PF regulation 6(2) – Plan rules may be more stringent than the NES-PF for matters of national importance. Plantation forest is a legitimate primary landuse, as is agriculture. It is not identified as a particular issue in relations to SNA's in the plan of any more importance or relevance than pastoral farming.</p> <p>3.2.5 Should there be any need based on a cost benefit analysis and environmental impact to restrict the presence of plantation forestry adjacent to SNA's, this should be a restriction of one tree length (35 - 40 metres), any further control is not justified as there would not be any impact from plantation forestry that could not be appropriately managed.</p> <p>3.2.6 Delete this rule.</p>
Q1 1	Supporting documents?
	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/8149740cee8ed22fc91ca24bd5a12238f2e5122d/original/1661910087/a457eda94102f52076c004e967eb4402_2022_08_31_-_Waitaki_District_Plan_Draft_-_PF_Olsen_Comment.pdf?1661910087
Q1 2	If you need more space, or have other general comments, please leave them here

DDPR_feedback_0427s	
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Response Date	Aug 31 22 01:42:51 pm
Notes	Heather Arnold
Q 1	Select the chapter you want to provide feedback on
	Ecosystems and Indigenous Biodiversity
Q 2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q 3	Objective/Policy/Rule/Standard reference:
	ECO-R7 - Planting species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas is a prohibited activity
Q 4	Feedback/Comments
	3.3 Prohibited rules for Plantation Forestry 3.3.1 ECO-R7 - Planting species that result in wilding conifers within a Significant Natural Area, or within 100m of a Significant Natural Area listed in SCHED6 – Significant Natural Areas is a prohibited activity 3.3.2 This rule is not enforceable. Wilding trees can come from a variety of sources, not solely from planting trees. It unfairly targets planting trees. The management of wilding conifers is a matter for Regional Pest Management Plans. 3.3.3 Delete this rule.
Q 5	Objective/Policy/Rule/Standard reference:
	ECO standards
Q 6	Feedback/Comments
	3.4 ECO standards 3.4.1 ECO-S4 establishes the locations and types of indigenous vegetation that can be cleared in areas not identified as SNA's. The limits are prohibitive to any primary land use. The definitions are too broad and will result in a significant number of resource consents being required for general land use practices. 3.4.2 There are many examples where manuka, coprosma, matagori etc are spreading over farmland as stock don't eat it. There should be an allowance to clear vegetation that stock does not eat, that has established over a specified timeframe (e.g. 20 years). 3.4.3 Increase the allowances to ensure practical and appropriate controls.
Q 7	Objective/Policy/Rule/Standard reference:
Q 8	Feedback/Comments
Q 9	Objective/Policy/Rule/Standard reference:

Q 1 0	Feedback/Comments
Q 1 1	supporting documents?
	0
Q 1 2	If you need more space, or have any other general comments, please leave them here

DDPR_feedback_0428s	
Name	Heather Arnold
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Response Date	Aug 31 22 01:44:29 pm
Notes	Heather Arnold
Q 1	Select the chapter you want to provide feedback on
	Natural Features and Landscapes
Q 2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q 3	Objective/Policy/Rule/Standard reference:
	NFL-R9 – Plantation forestry within or on a Significant Natural Feature or Rural Scenic Landscape.
Q 4	Feedback/Comments
	<p>4.1 NFL-R9 – Plantation forestry within or on a Significant Natural Feature or Rural Scenic Landscape.</p> <p>4.1.1 The Rural Scenic Landscape applies to approximately half of the General Rural zoned land in Waitaki that has not been identified as Outstanding Natural Landscape. Plantation forestry is a controlled activity in the Rural Scenic Landscape zone. “Rural scenic landscape” is not defined in the plan but appears to be an arbitrary provision that grandparents one type of land use over another, considered to be a “working” landscape. Plantation forestry is equally a working landscape.</p> <p>4.1.2 The Outstanding Natural Landscape zone in Waitaki equates to approximately 40% of the district, with plantation forestry prohibited in the zone.</p> <p>4.1.3 There is no justification for any controls on plantation forestry in the Rural Scenic Landscape.</p> <p>4.1.4 Delete NFL-R9.</p>
Q 5	Objective/Policy/Rule/Standard reference:
	NFL-R15 - Planting species that can result in wilding conifers on or within Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes is a prohibited activity
Q 6	Feedback/Comments
	<p>4.2 NFL-R15 - Planting species that can result in wilding conifers on or within Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscapes is a prohibited activity</p> <p>4.2.1 This rule is not enforceable. Wilding trees can come from a variety of sources, not solely from planting trees. It unfairly targets planting trees. The management of wilding conifers is a matter for Regional Pest Management Plans.</p>
Q 7	Objective/Policy/Rule/Standard reference:
Q 8	Feedback/Comments
Q 9	Objective/Policy/Rule/Standard reference:

Q 1 0	Feedback/Comments
Q 1 1	supporting documents?
	0
Q 1 2	If you need more space, or have any other general comments, please leave them here

DDPR_feedback_0429s	
Name	Heather Arnold
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Response Date	Aug 31 22 01:45:39 pm
Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on
	Coastal Environment
Q2	In general, to what extent do you support the contents of this chapter?
	Oppose
Q3	Objective/Policy/Rule/Standard reference:
	The Coastal Environment has been identified as an area where plantation forestry is to be discouraged. This should only apply to new plantation forest.
Q4	Feedback/Comments
	5. Coastal Environment 5.1 The Coastal Environment has been identified as an area where plantation forestry is to be discouraged. This should only apply to new plantation forest. 5.2 The Plan needs to guide users as to which rules are more stringent than the NES-PF and which activities are covered by the NES-PF. It also needs to clarify if existing use rights apply for established plantation forest.
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here

DDPR_feedback_0430s	
Name	Heather Arnold
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Response Date	Aug 31 22 01:47:42 pm
Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
	Earthworks
Q4	Feedback/Comments
	6. Earthworks 6.1 The Plan needs to guide users as to which rules are more stringent than the NES-PF and which earthworks activities are covered by the NES-PF. 6.2 With the exception of the matters provided by NES-PF regulation 6, all earthworks in relation to plantation forestry should be referred to the NES-PF.
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
	0
Q12	If you need more space, or have any other general comments, please leave them here

DDPR_feedback_0431s	
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Response Date	Aug 31 22 01:48:51 pm
Notes	Heather Arnold
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
	National Environmental Standards for Plantation Forestry
Q4	Feedback/Comments
	<p>7. National Environmental Standards for Plantation Forestry</p> <p>7.1 Regulation 6 of the NES-PF provides for rules to be more stringent than the NES-PF to:</p> <p>1. give effect to:</p> <ul style="list-style-type: none"> • An objective developed to give effect to the NPS-FM • Any of policies 11, 13, 15, and 22 of the NZCPS <p>2. recognise and provide for the protection of:</p> <ul style="list-style-type: none"> • Outstanding Natural Features and Landscapes • Significant Natural Area <p>3. manage:</p> <ul style="list-style-type: none"> • Activities in karst geology <p>7.1.1 The plan should provide clear guidance to users as to which rules are more stringent than the NES-PF.</p>
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here