

Central Hawke's Bay District Proposed District Plan Submission

To: Central Hawke's Bay District Council

1. Submitter details

Name: Rayonier Matarki Forests

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Contact Person:

Kelsey Tills-Environmental Coordinator

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Contact Person Contacts:

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2. Trade competition declaration

We would not gain an advantage in trade competition by this submission.

3. Hearing options

We do wish to be heard in support of this submission and we would consider presenting a joint case with others that may make similar submissions.

4. Submission details

We attach a chart setting out the submission details.

Signed:

A handwritten signature in blue ink, appearing to read 'Trish Fordyce', is located in the upper left quadrant of the page.

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Trish Fordyce on behalf of Kelsey Tills

Dated 6 August December 2021

Provision	Support	Reasons	Relief
ECO Introduction-It is anticipated that the approach in this District Plan will go a long way towards giving effect to the likely requirements of the NPS-IB.	Do not support	<p>the provisions relating to plantation forestry, the non-alignment to the provisions of the National Environmental Standard for Plantation Forestry (NESPF)</p> <p>while the council may be more stringent in providing provisions for protection of significant indigenous vegetation and habitats there must be an assessment undertaken of the effects of the provisions of the NESPF. There has been no assessment.</p>	Delete this statement and provide information as to why plantation forestry provisions do not align with the NESPF and even the provisions within the draft NPSIB
ECO I 1 and the explanation	Do not support	<p>There has clearly been no assessment of how the NESPF provisions are protecting and maintaining indigenous biodiversity and only impacts on farmers have been considered. While the Council wishes to find a balance for its farmers there is no such consideration for plantation forest owners.</p>	Delete entire provision until there is an assessment of the alignment with the NESPF and impacts on plantation forestry
ECO P 1	Support	Mapping provides certainty	retain
Criterion 6	Support in part	Again there is only reference to farming and there needs to be inclusion of provisions relating to plantation forestry	<p>Add to the second bullet point where there is exceptions to pasture-“exotic plantation forestry”</p> <p>Add to the list of matters connected-“fire ponds”</p>
ECO P 2	Support in part	<p>Only areas that are mapped should be protected otherwise there is uncertainty for landowners</p> <p>Do not support the inclusion of earthworks and vegetation clearance as this would affect plantation forestry operations and no assessment has been undertaken of the effects of the provisions of the NESPF.</p>	<p>Insert “identified and mapped in the district plan” after the word “areas”.</p> <p>Delete the words “earthworks and vegetation clearance”</p>

ECO P4 1	Do not support	This provision would require resource consent for harvesting plantation forests The definition of indigenous vegetation would include understorey in plantation forests along with failed crop areas and the like	Insert that this does not apply to the planation forestry under the NESPF
ECO-R1	Support	Understorey in plantation forests should be able to be cleared when harvesting	retain
ECO-R2	Do not support	For plantation forestry the provisions of regulation 93 NESPF should apply. They are specific to the effects of plantation forestry and no assessment has been undertaken to apply farm centric effects to forestry operations.	Provide for the provisions of the NESPF to apply Add the note that is for ECO-R3
ECO-R4	Do not support	For plantation forestry the provisions of regulation 93 NESPF should apply. They are specific to the effects of plantation forestry and no assessment has been undertaken to apply farm centric effects to forestry operations.	Provide for the provisions of the NESPF to apply Add the note that is for ECO-R3
EW-R2 and R3 And the associated standards EW S2-7	Do not support	It is not clear if earthworks in plantation forestry fall within the scope of these and provisions. For quarries they only include farm quarries and not forestry ones. Hawkes Bay Regional Council is enforcing the provisions relating to earthworks and land disturbance under the NESPF.	Exclude earthworks and land disturbance activities that relate to the NESPF.
Definitions-indigenous vegetation	Support in part	There should be an exclusion of understory of plantation forests. There is in the rules but should be within the definition	Insert-but does not include indigenous understorey f Plantation Forests
Definitions- Plantation Forestry Quarry	support	There is provision for a farm quarry but not for one in plantation forests. There is no reason to restrict such provisions	Insert the definition as in the NESPF
Definitions-cultivation	Support in part	This definition relates to farming and it has been found can include mechanical land preparation as set out under the NESPF	Insert at end of definition “does not include mechanical land preparation as provided for under the NESPF

Section 32 report ecosystems and Indigenous Biodiversity	Support in part	We do not agree with the assessment that the provisions will avoid duplication of processes for plantation forestry. There has been no assessment of how the NESPF is working in the district and how it protects the indigenous biodiversity of the district	Where wanting to provide more stringent provisions than the NESPF then undertake a proper assessment of the provisions and the impact on plantation forestry.
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