

## Plan Change 3 - Significant Natural Areas - Summary of Submissions

Topic	Submitter #	Sub. Point #	Submitter Name	Address for Service (Email)	Support / Oppose	Wish to be heard (Y/N)	Consider Joint Pres. (Y/N)	Decision Sought	Reasons	Further Submitter Name	Further Sub #	FS Point #	Support / Oppose Sub	Wish to be heard	Consider Joint Pres (Y/N)	FS Decision Sought	FS Reasons
Site 015 - Waiteti Stream	6	6.01	[Withdrawn]	<a href="mailto:coatshj@actrix.co.nz">coatshj@actrix.co.nz</a>	N/A	N/A	N/A	[Withdrawn]	[Withdrawn]	Director General of Conservation	5	5.07	O (part)	Y	Y	Retain site as SNA with blue area included and yellow areas removed.	The blue area contains significant indigenous vegetation and appears to be fenced off as part of wider gully SNA. There is no indication of pasture. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 015 - Waiteti Stream	6	6.01	[Withdrawn]	<a href="mailto:coatshj@actrix.co.nz">coatshj@actrix.co.nz</a>	S	Y	Y	[Withdrawn]	[Withdrawn]	Federated Farmers	6	6.07	S	Y	Y	Allow submission	This practical request is consistent with the decision sought in our submission.
Site 659 - Mervyn Street	1	1.01	Aislabie, V & B	<a href="mailto:veronica.aislabie01@gmail.com">veronica.aislabie01@gmail.com</a>	S	N	N	Supports not to include their property as SNA [at 52 Dudley Road] that is already covenanted.	The area identified for further protection in your maps predominantly exists across the property boundary at 62 Dudley Road. We agree that providing further protection to these types of areas, which are already protected could cause confusion in the future.	Director General of Conservation	5	5.01	O	Y	Y	Include all sites that meet significance criteria, even if they are already covenanted	The Director-General considers that all sites that meet the significance criteria in the WRPS and BOPRS must be included as SNAs
f) Sites with alternative legal protection (general points)	2	2.01	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		(Regarding new and expanded SNAs) - Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Regarding considering of new and expanded SNAs - BOPRC retain concerns about the exclusion of some sites assessed as meeting the RPS Appendix F Set 3 criteria and/or provided protection under other means. We consider areas covenanted or protected by other mechanisms should still be added where these sites meet SNA assessment criteria. Generally these covenants seek to protect indigenous vegetation/ecological values which aligns with the purpose of SNAs. Our main concern is occasionally covenants are removed to enable subdivision and development inconsistent with the purpose of PC3. Excluding such areas poses a risk that their private protection status may be removed leaving them with no protection under the District Plan. Inclusion of all sites that meet the significance criteria is required under RPS Policies MN 1B (a) & (c) and MN3B (c). BOPRC seeks to avoid a piecemeal approach to the District Plan SNA layer. Our preference is to ensure that the full extent of the SNAs are mapped across the district, to ensure there is a robust repository of all SNAs allowing for the completeness of the layer. Excluding sites afforded private protection from the SNAs maps and schedule doesn't lend well to future protection of sites under these other mechanisms.	Federated Farmers	6	6.01	O	Y	Y	Disallow submission	FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data.
f) Sites with alternative legal protection (general points)	2	2.01	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		(Regarding new and expanded SNAs) - Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Regarding considering of new and expanded SNAs - BOPRC retain concerns about the exclusion of some sites assessed as meeting the RPS Appendix F Set 3 criteria and/or provided protection under other means. We consider areas covenanted or protected by other mechanisms should still be added where these sites meet SNA assessment criteria. Generally these covenants seek to protect indigenous vegetation/ecological values which aligns with the purpose of SNAs. Our main concern is occasionally covenants are removed to enable subdivision and development inconsistent with the purpose of PC3. Excluding such areas poses a risk that their private protection status may be removed leaving them with no protection under the District Plan. Inclusion of all sites that meet the significance criteria is required under RPS Policies MN 1B (a) & (c) and MN3B (c). BOPRC seeks to avoid a piecemeal approach to the District Plan SNA layer. Our preference is to ensure that the full extent of the SNAs are mapped across the district, to ensure there is a robust repository of all SNAs allowing for the completeness of the layer. Excluding sites afforded private protection from the SNAs maps and schedule doesn't lend well to future protection of sites under these other mechanisms.								
f) Sites with alternative legal protection (general points)	2	2.02	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		(Regarding removed SNAs) - Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Regarding removal of sites that have alternative legal protection - BOPRC seek all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B(c). BOPRC considers covenanted areas or areas with some other level of protection that meet the significance should still be added. Often the intention of these covenants is to protect the native vegetation/ecological value and therefore aligns with the site being made an SNA. It does not change the fact that these sites meet the SNA criteria. Further, occasionally covenants are removed to enable development inconsistent with the purpose of the PC3 (SNAs). Excluding such areas poses a risk that their private protection status may be removed leaving them with no protection under the District Plan. BOPRC seeks to avoid a piecemeal approach to the District Plan SNA layer. Our preference is to ensure that the full extent of the SNAs are mapped across the district, to ensure there is a robust repository of all SNAs allowing for the completeness of the layer. Excluding sites afforded private protection from the SNAs maps and schedule doesn't lend well to future protection of sites under these other mechanisms.	Federated Farmers	6	6.02	O	Y	Y	Disallow submission	FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data.
h) Other sites not in scope of notified plan change	2	2.03	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Site #153 be included unless identified as not meeting the significance criteria.	Site #153 identified as wetland vegetation - wetlands are covered by National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and have been reduced to less than 10% of their former extent in the Bay of Plenty Region. Note: Parts of this site were identified in the recent desk top wetland extent mapping carried out by Landcare Research. Site 578 is outside the BOP region however the same information applies here. BOPRC seek that all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c). Ensure completeness of the SNA layer, District Plan schedule and maps.	Director General of Conservation	5	5.02	S	Y	Y	Allow submission that site 153 includes area of wetland vegetation and hence wetland areas should be included as SNAs	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in the BOP.
h) Other sites not in scope of notified plan change	2	2.03	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Site #153 be included unless identified as not meeting the significance criteria.	Site #153 identified as wetland vegetation - wetlands are covered by National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and have been reduced to less than 10% of their former extent in the Bay of Plenty Region. Note: Parts of this site were identified in the recent desk top wetland extent mapping carried out by Landcare Research. Site 578 is outside the BOP region however the same information applies here. BOPRC seek that all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c). Ensure completeness of the SNA layer, District Plan schedule and maps.	Federated Farmers	6	6.03	O	Y	Y	Disallow submission	The s32 report states that the status of sites 153 and 578 could not be determined from desktop information; this is a valid reason to not include them within the scope of PC3.
h) Other sites not in scope of notified plan change	2	2.04	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Site #578 be included unless identified as not meeting the significance criteria.	Site #153 identified as wetland vegetation - wetlands are covered by National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and have been reduced to less than 10% of their former extent in the Bay of Plenty Region. Note: Parts of this site were identified in the recent desk top wetland extent mapping carried out by Landcare Research. Site 578 is outside the BOP region however the same information applies here. BOPRC seek that all sites that meet the significance criteria are included as snaps. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c). Ensure completeness of the SNA layer, District Plan schedule and maps.	Director General of Conservation	5	5.03	S	Y	Y	Allow submission that Site 578 includes area of wetland vegetation and hence wetland areas should be included as SNAs	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in the BOP.
h) Other sites not in scope of notified plan change	2	2.04	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Site #578 be included unless identified as not meeting the significance criteria.	Site #153 identified as wetland vegetation - wetlands are covered by National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and have been reduced to less than 10% of their former extent in the Bay of Plenty Region. Note: Parts of this site were identified in the recent desk top wetland extent mapping carried out by Landcare Research. Site 578 is outside the BOP region however the same information applies here. BOPRC seek that all sites that meet the significance criteria are included as NAS. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c). Ensure completeness of the SNA layer, District Plan schedule and maps.	Federated Farmers	6	6.04	O	Y	Y	Disallow submission	The s32 report states that the status of sites 153 and 578 could not be determined from desktop information; this is a valid reason to not include them within the scope of PC3.
h) Other sites not in scope of notified plan change	2	2.05	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Re exclusion of this site due to ownership - BOPRC seek that all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c).								
h) Other sites not in scope of notified plan change	2	2.06	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Regarding the acknowledgement in section 1.3 of the Section 32 Report that a number of additional amendments to existing SNAs and new SNAs have also been identified in a recent draft report (Wildland Consultants 2018c) but excluded from scope due to the need to progress the sites already under consideration - BOPRC seek that all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c).	Director General of Conservation	5	5.04	S	Y	Y	Allow submission to include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRS must be included as SNAs
h) Other sites not in scope of notified plan change	2	2.06	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Regarding the acknowledgement in section 1.3 of the Section 32 Report that a number of additional amendments to existing SNAs and new SNAs have also been identified in a recent draft report (Wildland Consultants 2018c) but excluded from scope due to the need to progress the sites already under consideration - BOPRC seek that all sites that meet the significance criteria are included as SNAs. This is required under RPS Policies MN 1B (a) & (c) and MN 3B (c).	Federated Farmers	6	6.05	O	Y	Y	Disallow submission	It is acknowledged in the Section 32 report that there is no certainty the additional sites described under section 1.3 would meet the significance criteria and as such can not be included into the SNA schedule. By necessity, the SNA identification process is always only going to be a 'snap shot of sites in time'. Non-regulatory methods are designed to help improve outcomes for those areas that are not quite at SNA status yet.

Site 141 - Pohaturoa Wetlands	2	2.07	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Along with the protection of significant indigenous vegetation and significant habitats of indigenous fauna Section 6(a) of the RMA identifies the preservation of wetlands to be another matter of national importance. BORPC has particular interest in ensuring the protection of wetlands identified as #141 Pohaturoa Wetland, #143 Reservoir Road Wetland and #148 Te Ngae Lake Edge Wetland. RLC has assessed the risk of not including these sites in the schedule as 'low'. This area is within Whakarewarewa Forest and these wetlands will be playing a part in the lake nutrient budgets. These wetlands should be included in the SNA schedule. Wildland Consultants (2017) made the recommendation that all existing wetlands in the Rotorua Catchment should be protected from development and drainage now. The protection should be formal and in perpetuity. These wetlands are already functioning to remove N from lake nutrient budgets; further reduction of these wetlands will increase the amount of N that needs to be removed from the lake by 'other' means. Only four lake edge wetlands currently have any legal protection status.											
Site 143 - Reservoir Road Wetland	2	2.08	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>	O	Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Along with the protection of significant indigenous vegetation and significant habitats of indigenous fauna section 6(a) of the RMA identifies the preservation of wetlands to be another matter of national importance. BORPC have particular interest in ensuring the protection of wetlands identified as #141 Pohaturoa Wetland, #143 Reservoir Road Wetland and #148 Te Ngae Lake Edge Wetland. RLC has assessed the risk of not including these sites in the schedule as 'low'. This area is within Whakarewarewa Forest and these wetlands will be playing a part in the lake nutrient budgets. These wetlands should be included in the SNA schedule. Wildland Consultants (2017) made the recommendation that all existing wetlands in the Rotorua Catchment should be protected from development and drainage now. The protection should be formal and in perpetuity. These wetlands are already functioning to remove N from lake nutrient budgets; further reduction of these wetlands will increase the amount of N that needs to be removed from the lake by 'other' means. Only four lake edge wetlands currently have any legal protection status.											
Site 148 - Te Ngae Lake Edge Wetlands	2	2.09	Bay of Plenty Regional Council Toi Moana (BOPRC)	<a href="mailto:Nassah.Steed@boprc.govt.nz">Nassah.Steed@boprc.govt.nz</a>		Y		Include all sites that meet significance criteria. Ensure completeness of the SNA layer, District Plan schedule and maps.	Along with the protection of significant indigenous vegetation and significant habitats of indigenous fauna section 6(a) of the RMA identifies the preservation of wetlands to be another matter of national importance. BORPC has particular interest in ensuring the protection of wetlands identified as #141 Pohaturoa Wetland, #143 Reservoir Road Wetland and #148 Te Ngae Lake Edge Wetland. From a water quality perspective, site #148 - Te Ngae Lake Edge wetland should be included in the SNA schedule as a priority. This area plays an important role as a lake edge wetland, filtering nutrients from entering Lake Rotorua. As an existing wetland, its role is already accounted for in lake nutrient budgets. Given the location close to the lake, development pressure on this wetland should be considered high and this wetland complex should be included in the schedule to ensure the nutrient filtering values of the site are protected in the long-term. Wildland Consultants (2017) made the recommendation that all existing wetlands in the Rotorua Catchment should be protected from development and drainage now. The protection should be formal and in perpetuity. These wetlands are already functioning to remove N from lake nutrient budgets; further reduction of these wetlands will increase the amount of											
Various	2	2.01 - 2.09	Bay of Plenty Regional Council Toi Moana (BOPRC)					Refer to points mentioned above in submission points #2.01 - #2.09	Refer to points mentioned above in submission points #2.01 - #2.10	Forest and Bird	8	8.66-8.74	S	Y	Y	Allow submission	The amendments sought are necessary to give effect to the Regional Policy Statement and to provide for Councils responsibilities under Section 6 of the RMA			
Site 008 - Waiowhoro Flat Wetland	3	3.01	Campbell, R	<a href="mailto:rosscampbell@gmail.com">rosscampbell@gmail.com</a>	O	N	Y	I would like the council to review the current SNA classification [for SNA 8] and remove it from the paddock side of the Waikuta Stream.	Can we please give some consideration to reassessing the current SNA [at 39 Waikuta Road], because as it stands it is only a paddock and therefore is not a SNA. To better understand the real situation rather than relying on aerial photographs please feel free to arrange a visit to the property.	Director General of Conservation	5	5.05	S	Y	Y	Allow submission subject to groundtruthing	General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.			
Site 008 - Waiowhoro Flat Wetland	3	3.01	Campbell, R	<a href="mailto:rosscampbell@gmail.com">rosscampbell@gmail.com</a>	O	N	Y	I would like the council to review the current SNA classification [for SNA 8] and remove it from the paddock side of the Waikuta Stream.	Can we please give some consideration to reassessing the current SNA [at 39 Waikuta Road], because as it stands it is only a paddock and therefore is not a SNA. To better understand the real situation rather than relying on aerial photographs please feel free to arrange a visit to the property.	Federated Farmers	6	6.06	S	Y	Y	Allow submission	This practical request is consistent with the decision sought in our submission.			
i) Incentives and support	4	4.01	Campion, R	<a href="mailto:rcampion@xtra.co.nz">rcampion@xtra.co.nz</a>	S	Y	Y	Support SNA 154 with amendment - reduced rates - we would like to see a permanent reduction of our rates maybe based on a per hectare saved into SNA.	While we are happy with revised SNA boundaries on our property, we are still losing the use of a large area of our land.											
Site 154 - Te Miri Road	4	4.02	Campion, R	<a href="mailto:rcampion@xtra.co.nz">rcampion@xtra.co.nz</a>	S	Y	Y	Support SNA 154 with amendment - reduced rates - we would like to see a permanent reduction of our rates maybe based on a per hectare saved into SNA.	While we are happy with revised SNA boundaries on our property, we are still losing the use of a large area of our land.											
Site 142 - Poplar Avenue Wetlands	5	5.01	CNI Iwi Land Management Limited (CNIILML) on behalf of CNI Iwi Holdings Limited (CNIHIL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	That the additional area proposed to be included [for SNA 142] is not classified as SNA.	The vegetation does not meet significance criteria in the Bay of Plenty RPS. The additional areas identified are dominated by weeds. The intent of the RPS, objectives 19, 20, and 21, policies MN 1-4B can be given effect to without applying an SNA. The protective status of an SNA does not address the predominant risk to this site - plant and animal pests. Council does not identify how an SNA gives greater protection. The section 32 report states "On private land the main causes of decline are habitat destruction or modification through the removal, fragmentation and degradation of ecosystems, wetland drainage and the effects of pests and weeds." The risks either do not apply to this land in the context of FSC certified forest practice (which their lessee is certified under), or the SNA status does not address the risks identified (e.g. active pest control). Plantation forestry on land adjacent to this site will not lead to loss of protection of the site. Regulation under the National Environmental Standard for Plantation Forestry (NES-PF) already apply to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland [see regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3]. Note: Appendix 9.2.3.3.b of the District Plan identifies that the clearance of indigenous vegetation within SNA shall be: vegetation that is in an area subject to management by entities that have certification under Forest Stewardship Council Certification, which CNIILML holds. However as the NES-PF is more stringent than the District Plan in this regard, the NES-PF provisions prevail. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer to the site. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.2 which is to Support the integrity of SNAs and habitat of indigenous fauna by provision of buffers around SNAs. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft with limited weight. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association.	Director General of Conservation	5	5.06	O	Y	Y	Retain SNA as per Director General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in BOP. The Director-General opposes the removal of SNA without provision of appropriate evidence that the SNA does not meet RPS criteria.			
Site 700 - Mangaharakeke Waterfall	5	5.02	CNI Iwi Land Management Limited (CNIILML) on behalf of CNI Iwi Holdings Limited (CNIHIL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site is not classified as a SNA.	The area containing significant vegetation is overstated. Many sub-parts are dominated by weeds. Vegetation on at least one landform does not meet the Waikato RPS criteria. The intent of the Waikato RPS, objective 3.19, policy 11.2 and methods 11.2.1 - 3 can be met without an SNA. Most relevant is method 11.2.2. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the Waikato RPS method (11.2.2.a), therefore the cascade of avoidance, mitigation and offset (11.2.2.b-d) is not required. The site contains no rare, at risk, threatened or irreplaceable indigenous biodiversity (11.2.2.f); and the activity of plantation forestry located next to the site (11.2.2.g) if anything performs a protective function, in that the biggest risk appears to be domestic animals, deduced from the regional council seeking to fence all wetlands in this catchment. Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland [see regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3]. Note: Appendix 9.2.3.3.b of the District Plan identifies that the clearance of indigenous vegetation within SNA shall be: vegetation that is in an area subject to management by entities that have certification under Forest Stewardship Council Certification, which Timberlands holds. However as the NES-PF is more stringent than the District Plan in this regard, the NES-PF provisions prevail. The protective status of an SNA does not address the predominant risk to this site - plant and animal pests. Council does not identify how an SNA gives greater protection. The section 32 report states "On private land the main causes of decline are habitat destruction or modification through the removal, fragmentation and degradation of ecosystems, wetland drainage and the effects of pests and weeds." The risks either do not apply to this land in the context of FSC certified forest practice, or the SNA status does not address the risks identified (e.g. active pest control). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer to the site. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.2 which is to Support the integrity of Significant Natural Areas and habitat of indigenous fauna by provision of buffers around SNAs. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site.	Director General of Conservation	5	5.20	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in BOP. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken			

Site 700 - Mangaharakeke Waterfall	5	5.02	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site is not classified as a SNA.	The area containing significant vegetation is overstated. Many sub-parts are dominated by weeds. Vegetation on at least one landform does not meet the Waikato RPS criteria. The intent of the Waikato RPS, objective 3.19, policy 11.2 and methods 11.2.1 – 3 can be met without an SNA. Most relevant is method 11.2.2. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the Waikato RPS method (11.2.2.a), therefore the cascade of avoidance, mitigation and offset (11.2.2.b-d) is not required. The site contains no rare, at risk, threatened or irreplaceable indigenous biodiversity (11.2.2.f); and the activity of plantation forestry located next to the site (11.2.2.g) if anything performs a protective function, in that the biggest risk appears to be domestic animals, deduced from the regional council seeking to fence all wetlands in this catchment. Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Note: Appendix 9 2.3.3.b of the District Plan identifies that the clearance of indigenous vegetation <i>within</i> SNA shall be: vegetation that is in an area subject to management by entities that have certification under Forest Stewardship Council Certification, which Timberlands holds. However as the NES-PF is more stringent than the District Plan in this regard, the NES-PF provisions prevail. The protective status of an SNA does not address the predominant risk to this site – plant and animal pests. Council does not identify how an SNA gives greater protection. The section 32 report states "On private land the main causes of decline are <b>habitat destruction or modification</b> through the removal, fragmentation and degradation of ecosystems, wetland drainage and the effects of pests and weeds." The risks either do not apply to this land in the context of FSC certified forest practice, or the SNA status does not address the risks identified (e.g. active pest control). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer to the site. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.2 which is to Support the integrity of Significant Natural Areas and habitat of indigenous fauna by provision of buffers around SNAs. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Waikato Regional Council	13	13.01	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant based on aerial photographs and personal knowledge. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity.
Site 701 - Mangaharakeke Wetland	5	5.03	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site (SNA 701) is not classified as a SNA.	Vegetation does not all meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see NES-PF regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Director General of Conservation	5	5.22	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in BOP. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken
Site 701 - Mangaharakeke Wetland	5	5.03	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site (SNA 701) is not classified as a SNA.	Vegetation does not all meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see NES-PF regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Waikato Regional Council	13	13.02	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant based on aerial photographs and personal knowledge. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity. Mapping of the wetland will also assist landowners in identifying zones subject to inspection requirements under the proposed National Policy Statement for Freshwater Management (re. Proposed NPSFM 3.15(5)(a)(i-iii)).
Site 703 - Torepatutahi Stream Riparian	5	5.04	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Director General of Conservation	5	5.24	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 703 - Torepatutahi Stream Riparian	5	5.04	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	C & W Tozer	12	12.01	Support	Y	Y	Allow CNILML submission opposing the classification of this area as an SNA.	Concur that the gully system is not a riparian – it is a dry gully system – only flowing in periods of extreme rainfall (severe thunderstorms). We support the CNILML conclusion that areas do not meet the requirements of the RMA section 6(a) or significance criteria for RMA 6(c). Agree with the submitter that an SNA classification introduces yet another layer of compliance assessment when the existing protection mechanisms are adequate. We seek that the CNILML submission be allowed.
Site 703 - Torepatutahi Stream Riparian	5	5.04	CNI Iwi Land Management Limited (CNILML) on behalf of CNI Iwi Holdings Limited (CNIHL)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Waikato Regional Council	13	13.03	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant and important based on field work. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity.

Site 715 - Ohaaki Steamfield East	7	7.01	Contact Energy Ltd.	<a href="mailto:daniel.forbes@contactenergy.co.nz">daniel.forbes@contactenergy.co.nz</a> 07 376 2179	S	Y	Y	Support SNA 715 provided the area meets consistent and accepted ecological criteria and that sufficient flexibility is provided to allow the continued operation and development of renewable generation activities on the Ohaaki field and 'development geothermal fields'.	Proposed SNA 715 is within resource consent boundary 126153 of the Ohaaki Power Station. The Ohaaki East Steamfield is classified as Development Geothermal System by Waikato Regional Council and the operation was subject to a full assessment of effects and the resource consent process in 2013, including in relation to actual and potential effects on significant natural areas and geothermally tolerant vegetation. The consent is subject to conditions and extensive requirements to avoid, remedy and mitigate effects on natural areas such as Torepatutahi Wetland. Generation of renewable electricity is a matter of regional and national importance and key to the government's goal of 100% renewable electricity by 2035. While we support identification of SNAs in the Rotorua District Plan, our interest is in the rules that apply. Strict avoidance policies and rules could be inconsistent with the continued operation and development of renewable geothermal energy. This area would seem already controlled/managed under the SGF provisions of the District Plan (further detail provided in full submission). Contact is open to working with Council to ensure that any impacts of our operations are minimised, and steps taken to maintain, restore and enhance areas such as #715	Forest and Bird	8	8.75	Oppose in part	Y	Y	Disallow submission. That all areas meeting the criteria for significance be mapped as SNAs to give effect to the RPS.	The amendments sought are uncertain as to the Protection required under s6(c) of the RMA.
k) Other	8	8.01	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Commence review of the Lakes A zone mapping and provisions.	The Lakes A zone of the District Plan is currently overdue for review. A review of this zone would improve coherency of the current plan structure.								
f) Sites with alternative legal protection (general points)	8	8.02	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Retain SNA mapping on legally covenanted areas or areas under other forms of formal protection.	The Director-General opposes the removal of SNA mapping in areas with legally protected covenants, including QEII and considers that all areas that meet the SNA criteria contained in the Waikato RPS and Bay of Plenty RPS should be included in the SNA mapping. The proposed SNA mapping and scheduling is inconsistent with section 11A of the Waikato Regional Policy Statement which requires mapping of SNAs where there is an identified covenant such as QEII and where it meets the criteria. The Bay of Plenty Regional Policy Statement also requires mapping of SNAs where it meets the criteria in Appendix F set 3. Scheduling should therefore occur if the site meets criteria, regardless. Covenants are also able to be removed which poses a risk to SNAs. RMA enforcement issues may arise in relation to covenanted areas that meet RPS criteria but are not identified as SNAs under the plan.	Federated Farmers	6	6.08	O	Y	Y	Disallow submission.	FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data.
k) Other	8	8.03	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	SA	Y	Y	Update the District Plan maps using the updated DOC public conservation land layer; Show Wildlife Management Reserve on GIS layer planning maps surrounding the SNA for Lake Tutaeinanga as a PNA.	The current GIS layer used in the District Plan maps are not the most up to date version. There have been several changes in land tenures which are not reflected in the layer being used by Rotorua Lakes Council. For example, Waikite valley wetland is now public conservation land. The reserve which surrounds Lake Tutaeinanga should be shown as PNA. Currently the mapping only shows the lake as an SNA on the GIS layer.								
i) Incentives and support	8	8.04	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Council investigate an incentive fund for restoration and protection of SNAs.	The Director-General supports council initiatives to incentivise protection of SNAs including rates remission, removal of resource consent fees for protection and restoration works and direct funding of restoration and protection works.	Federated Farmers	6	6.09	S	Y	Y	Allow submission.	This is consistent with the decision sought in our submission.
i) Incentives and support	8	8.04	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Council investigate an incentive fund for restoration and protection of SNAs.	The Director-General supports council initiatives to incentivise protection of SNAs including rates remission, removal of resource consent fees for protection and restoration works and direct funding of restoration and protection works.	C & W Tozer	12	12.02	S (in part)	Y	Y	Council not just 'investigate', but as a matter of some urgency establish a meaningful incentive fund for the restoration and protection of SNAs.	We concur with Director General's support of ---'Council initiatives to incentivise protection of SNAs including rates remission, removal of resource consent fees for protection and restoration works and direct funding of restoration and protection works.'
Site 032 - Tumoana Point	8	8.06	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 32] as recommended.	The Director-General considers that scheduling of this area is required due to its significance and is at a high risk of disturbance. Inclusion of this site is also consistent with the RPS.								
Site 034 - Te Ngae Junction Wetland	8	8.07	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 34] as recommended.	The Director-General considers that scheduling of this area is required as a significant wetland site. Inclusion of this site is also consistent with the RPS.								
Site 037 - Maraeroa	8	8.08	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 37] as recommended.	The Director-General considers that scheduling of this area is required as a significant geothermal site. Inclusion of this site is also consistent with the RPS.								
h) Other sites not in scope of notified plan change	8	8.09	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>		Y	Y	Amend the scheduled identified area [SNA 111] to the extent to the north and east to include manuka scrubland and geothermal areas.	The Director-General considers that scheduling of this area is required due to its significant geothermal vegetation and features, however, requires extension to better reflect the actual extent of ecological significance.	Federated Farmers	6	6.10	O	Y	Y	Disallow submission.	It is acknowledged in the Section 32 report that there will be sites that are potential SNAs but for this Plan Change 3 there was not enough certainty they meet the significance criteria and as such cannot be included. By necessity, the SNA identification process is always only going to be a 'snap shot of sites in time'. Non-regulatory methods are designed to help improve outcomes for those areas that are not quite at SNA status yet.
Site 123 - Wharetata Bay	8	8.10	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 123] as recommended.	The Director-General considers that scheduling of this area is required as a significant geothermal and wetland site. Inclusion of this site is also consistent with the RPS.								

Site 124 - Otūtara Springs	8	8.11	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 124] as recommended.	The Director-General considers that scheduling of this area is required as a significant geothermal and wetland site and significant fauna habitat. Inclusion of this site is also consistent with the RPS.										
Site 127 - Otutara Road Lake	8	8.12	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 127] as recommended.	The Director-General considers that scheduling of this area is required as a significant lake and wetland. Inclusion of this site is also consistent with the RPS.										
Site 139 - Ngapuna Wetlands	8	8.13	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	SA	Y	Y	Amend the scheduled identified area [SNA 139] to extend to the south and east.	The Director-General considers that scheduling of this area is required due to its significance as a wetland site, however, requires extension to better reflect the wetland boundaries and extent of ecological significance.										
Site 141 - Pohaturoa Wetlands	8	8.14	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 141].	The Director-General considers that all significant unprotected wetlands should be identified as SNAs regardless of tenure.										
Site 142 - Poplar Avenue Wetlands	8	8.15	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Retain existing SNA 142 without amendment.	The Director-General considers that scheduling of this area is required as a significant wetland site, however, considers that all areas that meet the SNA criteria contained in the RPS should be included in the SNA mapping, regardless of additional covenants.										
Site 143 - Reservoir Road Wetland	8	8.16	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 143].	The Director-General considers that all significant unprotected wetlands should be identified as SNAs regardless of tenure.										
Site 147 - Tikitere Kahikatea	8	8.17	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 147] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest and wetland. Inclusion of this site is also consistent with the RPS.										
Site 148 - Te Ngae Lake Edge Wetlands	8	8.18	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 148] subject to amendments to ensure the appropriate area is included.	The Director-General considers that scheduling of this area is required as a significant wetland site. A lack of landowner consultation should not be considered as the main criteria for exclusion of an SNA.										
Site 151 - Tawa Road	8	8.19	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 151].	The Director-General considers that scheduling of this area is required as a significant forest site adjoining public conservation land. All significant unprotected sites should be scheduled as SNAs regardless of tenure when RPS criteria is met.										
Site 154 - Te Miri Road	8	8.20	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the whole identified area [SNA 154].	The Director-General considers that scheduling of this area is required as a significant forest site. A lack of landowner consultation should not be considered as the main criteria for exclusion of an SNA.	A Brill-Copley	4	4.01	O	N	N	Do not adopt the proposed change for my property [at 73 Te Manu Road]	The area that the plan change effects is fenced and protected from livestock and currently has a pest management plan in place by myself (the owner). Therefore I see no reason why the plan change needs to effect my property while under my ownership. I have the land's best interest at heart and am keen to see it return to something close to what it was. The management of the land is nothing I can't handle myself with hard work and diligence. Therefore I strongly oppose the whole plan change for my property.		
Site 155 - Horohoro Forest East	8	8.21	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 155] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 156 - Horohoro Forest Extension	8	8.22	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 156] as recommended. (It is noted that this option refers to SNA155 rather than 156 as stated in the 32A report)	The Director-General considers that scheduling of this area is required as a significant forest site adjoining public conservation land. Inclusion of this site is also consistent with the RPS.										
Site 157 - Anderson Road	8	8.23	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 157] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 158 - Hauraki Stream	8	8.24	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 158] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 167 - Tikitere Hill Forest	8	8.25	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 167] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 172 - Upper Wairau Bay	8	8.26	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 172] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 177 - Pohaturoa	8	8.27	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	SA	Y	Y	Amend [SNA 177] as per the Landcare Research report for Bay of Plenty Regional Council: An updated assessment of geothermal vegetation in the BOP region based on aerial photography (p231).	The Director-General considers that scheduling of this area is required due to its significance as a geothermal site, however, considers that the SNA boundaries are incorrect and require extension to better reflect the wetland boundaries and extent of ecological significance. The area of significant geothermal vegetation is larger than currently mapped.										
Site 658 - Upper Pipikārihi Road	8	8.28	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 658] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 659 - Mervyn Street	8	8.29	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 659] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.										
Site 660 - Mid Mangorewa Gorge	8	8.30	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the two additional sites for SNA 660.	The Director-General considers that scheduling of this area is required as a significant forest site adjoining conservation land. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.	H Beaufill	2	2.01	O	N	Y		Oppose the submission as a whole on the basis that SNA 660 does not adjoin conservation land as stated. Further, the site does not have the canopy on some edges suggested by the aerial photography as those areas are currently grazed and provide shelter for livestock.		

Site 679 - Te Waerenga Road 2	8	8.31	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area for SNA 679. The Director-General considers that scheduling of these areas is required as significant forest sites. Although fragmented many are close by or almost contiguous. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.	A Bedford	3	3.02	O	Y	Y	[Do not] Schedule the entire area for SNA 679	Consideration should be given to land owners to have areas excluded or boundary adjustments made due to Health, Safety and well-being of occupants where the dwelling is located inside the purposed SNA area. As for the property of 829 Te Waerenga the dwelling is in the SNA area, consideration should be given to the shade from the trees as they mature and the effect this would have on the dwelling and the occupants.	
Site 679 - Te Waerenga Road 2	8	8.31	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area for SNA 679. The Director-General considers that scheduling of these areas is required as significant forest sites. Although fragmented many are close by or almost contiguous. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.	Federated Farmers	6	6.11	O	Y	Y	Disallow submission.	FFNZ supports the pragmatic approach taken in the notified Plan change. There is a range of options available to improve biodiversity outcomes on private land – identifying an area as an SNA is not the only way to 'protect' a site.	
Site 679 - Te Waerenga Road 2	8	8.31	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area for SNA 679. The Director-General considers that scheduling of these areas is required as significant forest sites. Although fragmented many are close by or almost contiguous. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.	Moyle & Lane	10	10.01	O	N	N	[Do not] Schedule the entire area for SNA 679	No account has been made of the benefits individual ownership provides. This submission makes the false presumption that an authoritarian high handed one solution approach will work. What hasn't been understood is the environmental passion we as individual landowners have invested in our property. We have fenced, removed blackberry and barberry and trapped our very small bush area at our own expense. We pay rates on this privately owned land. An SNA will effectively make us tenants of our own land and will be totally counterproductive to what this submitter hopes to achieve.	
Site 679 - Te Waerenga Road 2	8	8.31	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area for SNA 679. The Director-General considers that scheduling of these areas is required as significant forest sites. Although fragmented many are close by or almost contiguous. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.	P Loest	11	11.01	O	N	Y	[Do not] Schedule the entire area for SNA 679	I believe the Director-General's submission completely ignores the severe impacts that the proposed SNA scheduling of our home property would have on our family's well being and future. It also doesn't take into consideration the errors made in the assessment that lead to the proposed SNA scheduling. It is easy for the Director-General of Conservation to make these submissions from behind a desk without having been on site. We are the ones that would have to live with the disproportionate consequences every day. I find her high level view on the issue at hand offensive as it completely lacks empathy for caring land owners. I have attached more detailed description of our position.	
Site 680 - Jackson Road	8	8.32	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 680] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.								
Site 681 - Mangorewa Kaharoa	8	8.33	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 681] subsequent to a field check of site to further ascertain if smaller areas identified are significant.	The Director-General considers that scheduling of this area is required as a significant forest site, however, the suggested removal of smaller sites has somewhat arbitrary boundaries especially as the site has not been ground truthed.	Federated Farmers	6	6.12	S (in part)	Y	Y	Allow submission in part.	Support is extended to the relief sought for the site to be ground truthed to determine whether it is significant against the criteria, before being included into the district plan.
Site 708 - Tokerau Wetland A	8	8.34	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	SA	Y	Y	Schedule the identified area [SNA 708] as recommended but with amendments to extend SNA further South East to include the remainder of the wetland and forested area.	The Director-General considers that scheduling of this area is required as a significant wetland site, however, requires extension to better reflect the actual extent of ecological significance.	Vercoe Farm Partnership (received out of timeframe)	14	14.1	Oppose	N	N	Objects to Plan Change 3 for the following reasons: 1. We had no knowledge of Plan Change 3 and its implications for Tokerau A12 Block until we received your letter dated 5 December 2019, stating that the proposal had been extended to include the block. 2. Ownership of Tokerau A12 is totally different to Tokerau A11. 3. Under this process we consider our block should be given its own SNA number and accordingly any consultations and decisions to be made in this respect will be separate from those made from Tokerau A11. 4. We also note from the map the inclusion of the piece of native bush covering the hillside adjacent to the wetland. This contains a natural spring which we use as an alternative stock and domestic water supply. Consequently, we want this piece excluded from any further proposals.	
Site 709 - Tokerau Wetland B	8	8.35	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 709] as recommended.	The Director-General considers that scheduling of this area is required as a significant wetland site. Inclusion of this site is also consistent with the RPS.								
Site 415 - Barker Road	8	8.36	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 415] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.								
Site 417 - Arahiwi	8	8.37	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 417] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.								
Site 577 - Rahopkapaka Stream	8	8.38	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 577] as recommended.	The Director-General considers that scheduling of this area is required as a significant forest site. Inclusion of this site is also consistent with the RPS.								
Site 579 - Tahunaatura Stream Gorge	8	8.39	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [SNA 579] as recommended.	The Director-General considers that scheduling of this area is required as a significant secondary vegetation site. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.								
Site 582 - Lake Atiamuri North Faces	8	8.40	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 582] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation and as a significant wetland site. Inclusion of this site is also consistent with the RPS.								
Site 583 - Lake Atiamuri South Faces	8	8.41	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 583] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. Inclusion of this site is also consistent with the RPS.								
Site 585 - Lake Ohakuri Northwest Riparian Faces	8	8.42	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	SA	Y	Y	Amend the scheduled identified area for SNA 585 to the West side of Southern most section of the SNA.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation, however, requires amendment to better reflect the actual extent of ecological significance. Some of the SNA is pasture and there is significant secondary vegetation outside of the SNA.	Mercury Energy	9	9.01	O (part)	Y	N	Disallow submission.	Mercury seeks clarity on relief sought by DOC. Mercury seeks to ensure activities associated with operation, maintenance, upgrading of renewable electricity generation activities are not constrained by Plan Change 3. Mercury has freehold ownership Ohakuri electricity generation core site. Mercury seeks to ensure proposed SNA's do not expand further than notified over Ohakuri Power Station core site.



Site 589 - Lake Ohakuri Northeast Riparian	8	8.43	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 589] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. Inclusion of this site is also consistent with the RPS.										
Site 590 - Waihuhunu Arm Riparian Faces and Wetland	8	8.44	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 590] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. Inclusion of this site is also consistent with the RPS.										
Site 592 - Ōrākeikōrako Extension (Excludes Geothermal Areas)	8	8.45	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 592] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. Inclusion of this site is also consistent with the RPS.										
Site 596 - Pukemoremore	8	8.46	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 596] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. Inclusion of this site is also consistent with the RPS.										
Site 597 - Wharekaunga Stream Riparian	8	8.47	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [as SNA 597]	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure										
Site 598 - Tokiaminga Stream Riparian	8	8.48	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [as SNA 598].	The Director-General considers that scheduling of this area is required as it contains significant wetland vegetation. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.										
Site 700 - Mangaharakeke Waterfall	8	8.49	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 700] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant wetland vegetation. Inclusion of this site is also consistent with the RPS.										
Site 701 - Mangaharakeke Wetland	8	8.50	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 701] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant wetland vegetation. Inclusion of this site is also consistent with the RPS.										
Site 703 - Torepatutahi Stream Riparian	8	8.51	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 703] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant secondary vegetation. It is also noted that a Land Improvement Agreement does not prevent vegetation clearance and is therefore not considered adequate protection.	C & W Tozer	12	12.03	O	Y	Y	[Do not schedule the identified area as SNA 703].	We question the significance of the 'secondary vegetation' due to there being no threatened or at-risk indigenous flora identified by Wildlands and because of the presence and ongoing invasive threat of wilding pines and disheartening impact of blackberry re-invasion despite our genuine efforts to control. We contend that the Regional Council Land Improvement Agreement across our property strictly controls vegetation clearance and provides adequate protection.		
Site 710 - Akatarewa East	8	8.52	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 710] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 712 - Te Kopia	8	8.53	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 712] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 713 - Mangamingi Station	8	8.54	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 713] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 714 - Matapan Road	8	8.55	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 714] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 715 - Ohaaki Steamfield East	8	8.56	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 715] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 716 - Maungakakamea (Rainbow Mountain)	8	8.57	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the identified area [as SNA 716].	The Director-General considers that scheduling of this area is required as a significant geothermal site. All significant unprotected sites that meet the RPS criteria must be scheduled as SNAs regardless of tenure.										
Site 717 - Upper Atiamuri West	8	8.58	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 717] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										
Site 718 - Western Te Kopia	8	8.59	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 718] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.	M and C Bayes	1	1.01	S	N	Y	Clarify the area included	The area mapped may not be sufficient		
Site 800 - Northern Paeroa Range	8	8.60	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 800] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.										

Site 801 - Murphy's Springs	8	8.61	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area [SNA 801] as recommended.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.									
d) Boundary changes to existing geothermal Sites	8	8.62	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Schedule the identified area as recommended for SNA 552, 555, 558, 567, 568, 571, 572, 573, 574.	The Director-General considers that scheduling of this area is required as it contains significant geothermal vegetation. Inclusion of this site is also consistent with the RPS.									
e) Sites reassessed at request of landowner (general points)	8	8.63	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	S	Y	Y	Remove SNAs as recommended for SNA 1, 2, 411, 5, 15, 45, 660, 664 Kapukapu Road.	The removal of these areas provides clarification for landowners that they are not significant.									
Site 664 - Onaia Stream	8	8.64	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area [do not make the amendments to [SNA 664].	The Director General considers that scheduling of the entire area with amendments suggested by council is required as it contains significant indigenous vegetation with significant kokako population.	Federated Farmers	6	6.13	O	Y	Y	Disallow submission.	FFNZ supports the pragmatic approach taken in the notified Plan change. There is a range of options available to improve biodiversity outcomes on private land – identifying an area as an SNA is not the only way to 'protect' a site.	
Site 664 - Onaia Stream	8	8.64	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	O	Y	Y	Schedule the entire identified area [do not make the amendments to [SNA 664].	The Director General considers that scheduling of the entire area with amendments suggested by council is required as it contains significant indigenous vegetation with significant kokako population.	W Fleming	7	7.01	S	N	Y	Remove proposed SNA from my farm.	One area of the farm was burnt in the 1960s and is not a natural area. I have lived here for over 58 years and there are no kokako in that area. The other area has been grazed since 1936 and has been logged four times. A major part of farm income has been from the sale of firewood. Only two sightings of kokako in the last 50 years. DOC have had opportunities to buy my firewood block but have never made an offer.	
h) Other sites not in scope of notified plan change	8	8.65	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>		Y	Y	Consider and include these additional SNAs or extensions to SNAs.	The Director-General considers that these areas should be considered and included in the SNA schedule. 1) 8 Mile gate wetland in Whakarewarewa Forest 2) Vegetation at the eastern end of SNA 657 - this vegetation is similar to that within the SNA 3) Rautawiri Stream upstream of Torepatutahi Stream, Broadlands - extensive oxbow wetland vegetation adjoining public conservation land. Also a stronghold for nationally threatened species Urtica Linearifolia 4) Rotoma No2 and 3 at Lake Rotoma as SNA - Council GIS layers incorrectly show these as protected by Nga Whenua Rahui kawenata. The sites are indigenous forest between a kawenata and public conservation land. 5) Newly discovered geothermal gully at NZTM E1885274 N5770289 near Pohaturua Whaka forest (as new SNA or part of SNA 177) 6) Geothermal fumarole in paddock at NZTM 1880669 N5744668 Te Kopia Geothermal West (as new SNA or part of SNA 712) 7) Wetlands east side of SH5 adjoining Lake Ngahewa Wetland (at NZTM 18955179D, 5754662N, 1895314E, 5754445N) 8) Wetland east side of SH5 adjoining Earthquake Flat Road realignment at NZTM 1893478E 9) Wetland at corner of Springs Road and SH5 near Mihi (NZTM 1888262E, 5736527N) 10) Wetland adjoining Hinehopu wetland SH30at NZTM 1906246E, 5784112N (as part of Hinehopu SNA) 11) Significant indigenous vegetation kahikatea-swamp maire forest corner Curtis Road SH30 at NZTM 1898348E, 5783270N 12) Significant wetland Roy Road Kaharoa at NZTM 1878536E, 5789837N 13) Significant wetland on west side of SH5 south of Lake Ngahewa wetland at NZTM 1878536E, 5789837N (add to SNA 572) 14) Expand SNA 89 to cover the significant kahikatea forest - Rotoma Recreation Reserve no longer exists so old reserve area needs incorporating into expanded SNA 15) Rotoma No 1 geothermal feature (Tikorangi Central) - a geothermal feature heated raw soil field that is not a Nga Whenua Rahui kawenata. Amend as per Landcare Research report for Bay of Plenty Regional Council: An updated assessment of geothermal vegetation in the BOP region based on aerial photography (P154) 16) Waitangi Soda Springs Mire - very significant wetland. Incorrectly identified as Nga Whenua Rahui kawenata on RLC GIS layer. 17) Large areas of significant indig. veg. adjoining Lake Ohakuri. Shown as DOC public conservation land on Rotorua Lakes Council GIS layer but now managed by Mercury and Contact Energy including areas in parcel IDs 43 and 65. As no longer protected they need to be shown as SNAs (add to SNA 585 or 589).	Federated Farmers	6	6.14	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.	



h) Other sites not in scope of notified plan change	8	8.65	Director-General of Conservation	<a href="mailto:mburns@doc.govt.nz">mburns@doc.govt.nz</a>	Y	Y	Consider and include these additional SNAs or extensions to SNAs.	The Director-General considers that these areas should be considered and included in the SNA schedule. 1) 8 Mile gate wetland in Whakarewarewa Forest 2) Vegetation at the eastern end of SNA 657 - this vegetation is similar to that within the SNA 3) Rautawiri Stream upstream of Torepatutahi Stream, Broadlands - extensive oxbow wetland vegetation adjoining public conservation land. Also a stronghold for nationally threatened species <i>Urtica Linearifolia</i> 4) Rotoma No2 and 3 at Lake Rotoma as SNA - Council GIS layers incorrectly show these as protected by Nga Whenua Rahui kawenata. The sites are indigenous forest between a kawenata and public conservation land. 5) Newly discovered geothermal gully at NZTM E1885274 N5770289 near Pohaturua Whaka forest (as new SNA or part of SNA 177) 6) Geothermal fumarole in paddock at NZTM 1880669 N5744668 Te Kopia Geothermal West (as new SNA or part of SNA 712) 7) Wetlands east side of SH5 adjoining Lake Ngaehewa Wetland (at NZTM 18955179D, 5754662N, 1895314E, 5754445N) 8) Wetland east side of SH5 adjoining Earthquake Flat Road realignment at NZTM 1893478E 9) Wetland at corner of Springs Road and SH5 near Mihi (NZTM 1888262E, 5736527N) 10) Wetland adjoining Hinehopu wetland SH30at NZTM 1906246E, 5784112N (as part of Hinehopu SNA) 11) Significant indigenous vegetation kahikatea-swamp maire forest corner Curtis Road SH30 at NZTM 1898348E, 5783270N 12) Significant wetland Roy Road Kaharoa at NZTM 1878536E, 5789837N 13) Significant wetland on west side of SH5 south of Lake Ngaehewa wetland at NZTM 1878536E, 5789837N (add to SNA 572) 14) Expand SNA 89 to cover the significant kahikatea forest - Rotoma Recreation Reserve no longer exists so old reserve area needs incorporating into expanded SNA 15) Rotoma No 1 geothermal feature (Tikorangi Central) - a geothermal feature heated raw soil field that is not a Nga Whenua Rahui kawenata. Amend as per Landcare Research report for Bay of Plenty Regional Council: An updated assessment of geothermal vegetation in the BOP region based on aerial photography (P154) 16) Waitangi Soda Springs Mire - very significant wetland. Incorrectly identified as Nga Whenua Rahui kawenata on RLC GIS layer. 17) Large areas of significant indig. veg. adjoining Lake Ohakuri. Shown as DOC public conservation land on Rotorua Lakes Council GIS layer but now managed by Mercury and Contact Energy including areas in parcel IDs 43 and 65. As no longer protected they need to be shown as SNAs (add to SNA 585 or 589).	Mercury Energy	9	9.02	O (part)	Y	N	Disallow submission	Relevant to SNA # 585. Mercury seeks clarity on relief sought by DOC. DOC submission refers to data/information not within the public domain. Further assessment is needed to which titles are the subject of this submission, but appears relevant to Lake Ohakuri (former PNA), upstream of the Ohakuri electricity generation core site and dam. Mercury have an easement to inundate Lake Ohakuri over land owned by the Crown. Mercury does not oppose this SNA in principle. Mercury has freehold ownership of Ohakuri electricity generation core site. Mercury seeks to ensure proposed SNA's do not expand further than notified over Ohakuri Power Station core site.
Various	8	8.01 - 8.65	Director-General of Conservation				Refer to points mentioned above in submission points #8.01 - #8.65	Refer to points mentioned above in submission points #8.01 - #8.66	Forest and Bird	8	8.01-8.65	S	Y	Y	Allow submission	That all areas meet the criteria in for significance in the RPS. That the additional SNAs identified be added for the reasons set out in the original submission. It is not appropriate to rely on a process under a different piece of legislation with a different purpose. The Department of Conservation responsibilities under Conservation Act do not replace the Council's functions and responsibilities under the RMA.
b) New sites and additions to existing sites (general points)	9	9.01	Federated Farmers of New Zealand (Federated Farmers)		SA	Y	Remove specific SNAs from PC3 process if an affected landowner disputes the accuracy of the mapping and/or wishes to have site visits undertaken by an ecologist to identify the site's ecological values. The costs of the onsite assessment are to be met by Council. It is accepted that if the site is confirmed as meeting a significance threshold and is accurately mapped it will be brought back into the PC3 process and become subject to District Plan provisions.	Some areas of vegetation may have been captured as SNAs inappropriately. In some, exotics are the predominant vegetation and/or the value of biodiversity is questioned and in others the mapping seems disconnected with what makes sense on the ground. Inaccuracies can occur with desktop analysis and we ask that for those sites which are disputed and where the affected landowner is keen to resolve the matter with onsite visits, Council accepts that sufficient uncertainty remains for those sites and they should not be included in the PC3 process at this time. This is important as not all landowners provided feedback pre-notification.	A Bedford	3	3.03	S	Y	Y	Site visits to establish areas of ecological value and the accuracy of mapping. Retain the amendments proposed	We support the Federated farmers view that areas need to be better accessed and mapped. We support that amended areas in the SNA plan be retained and further work on boundary alignment be conducted
b) New sites and additions to existing sites (general points)	9	9.01	Federated Farmers of New Zealand (Federated Farmers)		SA	Y	Remove specific SNAs from PC3 process if an affected landowner disputes the accuracy of the mapping and/or wishes to have site visits undertaken by an ecologist to identify the site's ecological values. The costs of the onsite assessment are to be met by Council. It is accepted that if the site is confirmed as meeting a significance threshold and is accurately mapped it will be brought back into the PC3 process and become subject to District Plan provisions.	Some areas of vegetation may have been captured as SNAs inappropriately. In some, exotics are the predominant vegetation and/or the value of biodiversity is questioned and in others the mapping seems disconnected with what makes sense on the ground. Inaccuracies can occur with desktop analysis and we ask that for those sites which are disputed and where the affected landowner is keen to resolve the matter with onsite visits, Council accepts that sufficient uncertainty remains for those sites and they should not be included in the PC3 process at this time. This is important as not all landowners provided feedback pre-notification.	Director General of Conservation	5	5.08	O	Y	Y	Disallow submission	The Director-General opposes the removal of SNA without provision of appropriate evidence that the SNA does not meet RPS criteria
e) Sites reassessed at request of landowner (general points)	9	9.02	Federated Farmers of New Zealand (Federated Farmers)		S	Y	Retain the amendments proposed for re-assessed SNAs, including the removal of part removal of SNAs as recommended in the Section 32 report.	Federated Farmers supports accurate planning maps and robust identification processes. The PC3 changes which amend boundaries based on the results of field assessments on existing SNAs or pre notification consultation with affected landowners are strongly supported. We understand some boundary amendments were made for practical reasons as well as ecological ones. This shows RLC is focused on the bigger picture and longer term gains. We fully support RLC in this collaborative approach, it will provide landowners some confidence that their issues are understood and addressed where possible. It will help foster a sense of good will required to achieve optimum protection for the remaining areas.								
f) Sites with alternative legal protection (general points)	9	9.03	Federated Farmers of New Zealand (Federated Farmers)		SA	Y	Remove SNA sites subject to alternative legal protection from the planning maps and associated schedule of SNAs in Appendix 2; and Introduce provisions into the plan to ensure sites which become subject to alternative legal protection after this plan change are not subject to the rules framework. This may include a new policy and permitted activity rule similar to the following: (New policy in Part 2 Section 6 Matters of national importance) "Sites that are protected by a registered covenant under the Reserves Act 1977, Conservation Act 1986 or Queen Elizabeth the Second National Trust Act 1977; already achieve the protection of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance under Section 6 of the Resource Management Act 1991". (New permitted activity rule in Part 9 Rural Activity table across all zones) "Activities that are carried out in accordance with the terms of a QEII National Trust or other covenant" (or words to that effect).	Federated Farmers is always keen to ensure District Plans do not duplicate controls or introduce unnecessary overlapping functions for material benefit. Sites protected by QEII Trust or similar legal mechanisms such as conservation covenants or management agreements with the Department of Conservation do not need to be subjected to another layer of regulation. The RMA s6(c) goals in relation to these sites will be better achieved via these alternative mechanisms. There are no negatives for biodiversity, only mutually beneficial advantages - reduced monitoring and potential enforcement required by Council; affected landowners only have to deal with the agency that they voluntarily entered into a protection partnership with; no need to deal with inconsistencies in covenants and the District Plan. Our only concern relates to sites covenanted after this PC3 process. They will remain subject to District Plan regulations, pending another plan change. In our view this is inefficient. For equity and to ensure landowners remains supported and incentivised the landowner needs a new policy and implementation method that ensures the site will not be subject to the planning regime event if it remains on the planning maps and appendix.	Director General of Conservation	5	5.09	O	Y	Y	Disallow submission to remove SNA sites subject to alternative legal protection from the planning maps and associated schedule of SNAs in Appendix 2; and introduce provisions into the plan to ensure sites which become subject to alternative legal protection after this plan change are not subject to the rules framework. This may include a new policy and permitted activity rule ....	The Director-General considers that all areas that meet the SNA criteria contained in WRPS and BOPRPS should be included in the SNA mapping, regardless of alternative legal protection. The Director-General also considers that the proposed introduction of provisions is outside the scope of this plan change.

f) Sites with alternative legal protection (general points)	9	9.04	Federated Farmers of New Zealand (Federated Farmers)		SA	Y		Ensure that any sites that are protected by alternative legal mechanisms but not listed on the planning maps or Appendix 2 have access to any of the incentives and support packages introduced to implement the recommendations of the Section 32 Report. This may require the introduction of new provisions into the District Plan and amendment of Table 13.10.1 - Subdivisions in Rural Zones Rule 17 along the lines of: "Subdivision in an additional lifestyle lot entitlement where a Significant Natural Area identified in Appendix 2 - Natural Heritage Inventory is proposed to be legally protected <u>or has been removed from Appendix 2 as the site is legally protected and the additional subdivision entitlement has not previously been granted.</u> "	It will be important to ensure access to incentives remains open to those with alternative protection mechanisms. This will not enable double dipping as the different schemes have different funding priorities.								
i) Incentives and support	9	9.05	Federated Farmers of New Zealand (Federated Farmers)		SA	Y		Introduce a new paragraph into Part 2 Section 6 Matters 2.2 Key Environmental issues 2.2.4 Significant Indigenous Vegetation (Significant Natural Areas) and Habitat along the lines of: <u>To ensure adequate protection is provided to those natural areas identified as having significance, a combination of voluntary techniques and regulatory measures within the District Plan is considered by Council to offer the best solution. This includes utilising Council ratepayers' money to provide meaningful incentives to enable good biodiversity management, such as provision of information and advice, contestable grants, waiver of consent fees and other non-regulatory tools that reflect the partnership approach required to achieve the best biodiversity gains;</u> AND Introduce new bullet point under Part 2 Section 6 Matters 2.3 Objectives and Policies, Policy 2.3.5.1 with wording similar to: <u>Provide incentives (e.g. funding assistance may be specified from time to time in the Council's Long Term Plan) to assist landowners with active restoration and protection of their Significant Natural Area</u> (or words to that effect).	Federated Farmers strongly supports the recommendations made in the Section 32 report for Incentives and Support, section 3.5 and summarised section 6.2. However, a strong link between the planning and funding documents is required to inform LGA funding decisions. Without that link these worthy intentions have no certainty and may be difficult to advance. Federated Farmers understands that ultimately it will require changes to the policies and funding sources outlined in the Long Term and Annual Plans to enable this incentivising approach, but District Plan provisions can be used to support, guide and improve transparency regarding long term, unchanging environmental goals and what funding commitments made be required to meet them. Part of the reasoning used in the Section 32 Efficiency and Effectiveness to achieve Objectives analysis, included recommending sites for inclusion in Appendix 2, as becoming an SNA may help increase awareness of the values and the potential for incentives and assistance. This reasoning is understood (if the significant criteria is reached), but requires action from Council to ensure those benefits are realised both for the landowner and for biodiversity gains. To date RLC has not prioritised these actions and that needs to change if the reasoning is going to be justified. The suggestions made in our relief sought provide the necessary amendments required to give weight and follow through to the Section 32 reasoning. Whilst we understand the plan change addresses the mapping of SNAs, not the associated rules and policies for SNAs our submission will seek relief which is consistent with the recommendations made in the Section 32 report. The relief is consistent with the intent of the plan change. Part 2 s6 matters of the District Plan and are required to ensure an efficient planning process is carried out and effective tools are in place to achieve improved biodiversity outcomes.	C & W Tozer	12	12.04	S (in part)	Y	Y		There is very real and urgent requirement to provide a range of incentives by way of public investment. Some of these are set out in the Federated Farmers 8 bullet point examples (paragraphs 2.7 and 2.8 of their submission) including rates remission, resource consent fee waivers and pest plant and pest animal control assistance. We support Federated Farmers contention that amendments to the Operative District Plan ('Incentives and Support' Section 3.5 of s32 Report) should have been included in PC3 to maintain momentum and equity and genuinely facilitate best biodiversity outcomes. We find it disappointing and difficult to comprehend that currently "Rotorua Lakes Council does not administer any assistance programme" for landowners with SNA's.
j) Performance standard for existing grazing	9	9.06	Federated Farmers of New Zealand (Federated Farmers)		SA	Y		Amend A9.2.3(3)(a)(viii) as follows: The continuation of grazing in the rural zone where it does not increase the scale and intensity as stated in the report by an agricultural consultant submitted to Rotorua District Council <u>within six months of the Plan being fully operative</u> , provided that the grazing does not cease for more than 12 months.	A9.2.3(3)(a)(viii) should be amended to provide the same opportunity to newly affected landowners as was given to those affected by the District Plan review. Federated Farmers is aware that key concerns for a number of affected landowners relates to existing use rights and whether they can continue to use an area, now ring-fenced as a SNA, in the same way that they always have. This is an understandable concern and one that was expressed by farmers, who found themselves in similar circumstances during the proposed District Plan review. Performance Standard A9.2.3(3)(a)(viii) was, in part, introduced via the appeals process, to find resolution on issues relating to existing use rights for grazing. Given the issues and context is the same and in the interests of providing equity to landowners who are newly affected as a result of PC3 bringing new areas under the rules framework, the opportunity provided under A9.2.3(3)(a)(viii) should be extended to them. The amendment is required to provide that equity and future proof this process. The six month time frame seems arbitrary.								
Various	9	9.01 - 9.06	Federated Farmers of New Zealand (Federated Farmers)					Refer to points mentioned above in submission points #9.01 - #9.06	Refer to points mentioned above in submission points #9.01 - #9.06	Forest and Bird	8	8.78-8.83	O	Y	Y	Disallow submission	Removing SNA status from sites that have other protection via covenant fails to give effect to the RPS. The removal of exotic vegetation within an SNA could adversely affect significant habitat values, for example the habitat of NZ Long Tailed Bat.
Site 037 - Maraeroa	10	10.01	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 37.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 123 - Wharetata Bay	10	10.02	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 123.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 124 - Otūtata Springs	10	10.03	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 124.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 127 - Otutara Road Lake	10	10.04	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 127.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 157 - Anderson Road	10	10.05	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 157.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 167 - Tikitere Hill Forest	10	10.06	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 167.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 172 - Upper Wairau Bay	10	10.07	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 172.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 708 - Tokerau Wetland A	10	10.08	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 708.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 709 - Tokerau Wetland B	10	10.09	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 709.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								
Site 577 - Rahopakapaka Stream	10	10.10	Hancock Forest Management New Zealand (HFM NZ)	<a href="mailto:rhawtree@hnrng.com">rhawtree@hnrng.com</a>	S	Y	Y	Adopt notified proposal for SNA 577.	HFM NZ supports the proposed changes to the District Plan for the sites listed as these sites are within forests managed by HFM NZ. All of the forests HFM NZ manages are certified by PEFC and FSC. These areas are already managed as reserves within the plantation forest and are responsibly managed as per the FSC & PEFC standards.								

Site 664 - Onaia Stream	11	11.01	Hartley, G	<a href="mailto:gdc@harley@gmail.com">gdc@harley@gmail.com</a>	O	Y	Y	Remove boundaries of SNAs for provision of new exotic planting of scrubland. Reconsider boundary of 664 SNAs, consideration of subdivision? Of land outside of your proposed boundaries.	Wildlands assessment of boundaries with recommendations to council we challenge these. Concerns: scale of plans maps provided, not equal. Grazed areas historically not been considered. No rebates to rates.	Director General of Conservation	5	5.10	O	Y	Y	Retain SNA as per Director-General's submission with yellow areas removed	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. SNAs cannot be removed to facilitate future development if they are assessed as significant. Landowner hasn't identified which specific areas are of concern so it is difficult to assess the relief sought. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 664 - Onaia Stream	11	11.01	Hartley, G	<a href="mailto:gdc@harley@gmail.com">gdc@harley@gmail.com</a>	O	Y	Y	Remove boundaries of SNAs for provision of new exotic planting of scrubland. Reconsider boundary of 664 SNAs, consideration of subdivision? Of land outside of your proposed boundaries.	Wildlands assessment of boundaries with recommendations to council we challenge these. Concerns: scale of plans maps provided, not equal. Grazed areas historically not been considered. No rebates to rates.	Federated Farmers	6	6.15	S	Y	Y	Allow submission.	This is consistent with the relief sought in our submission.
i) Incentives and support	12	12.01	Kaharoa Community Association	<a href="mailto:chrisjam@xtra.co.nz">chrisjam@xtra.co.nz</a>	S	N		Adopt the recommendation [to establish an incentive fund].	KCA supports Council establishing an incentive fund available to those with designated SNA's to help restore sections or parts of established bush that have become degraded for some reason and to establish fencing to further provide protection of that bush.	Federated Farmers	6	6.16	S	Y	Y	Allow submission.	This is consistent with the relief sought in our submission.
i) Incentives and support	12	12.02	Kaharoa Community Association	<a href="mailto:chrisjam@xtra.co.nz">chrisjam@xtra.co.nz</a>	S	N		Adopt the recommendation [to adopt a uniform rates remission policy for SNAs calculated on the capital value of the land designated as SNA].	KCA supports Council adopting a uniform rates remission policy for SNA's calculated on the capital value of the land designated as an SNA.	Federated Farmers	6	6.17	S	Y	Y	Allow submission.	This is consistent with the relief sought in our submission.
Site 679 - Te Waerenga Road 2	13	13.01	Loest, Philipp	<a href="mailto:philipp.loest@tll.co.nz">philipp.loest@tll.co.nz</a>	S	Y	N	I want the Council to approve the proposed Plan Change 3 [in regards to SNA 679]	As a directly affected landowner I am pleased that the proposed changes recognize the important role conservation minded landowners play. Scheduling our property as an SNA would add a completely unnecessary layer of rules/bureaucracy without providing any ecological benefit. The many negative impacts would lessen our young families quality of life and undermine our long term financial stability. The proposed change allows us to look into the future with optimism. It empowers us and our neighbours to continue taking care of the properties we love and are proud to call home.	A Bedford	3	3.01	O	Y	Y	[Do not proceed with] The scheduling of the complete SNA 679 unopposed	Consideration should be given to all land owners that have dwellings inside the SNA to have boundaries clarified and adjusted before approval.
Site 585 - Lake Ohakuri Northwest Riparian Faces	15	15.01	McPherson, A		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.30	O	Y	Y	Disallow the submission point. Retain site as SNA as per Director General's submission	site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	15	15.01	McPherson, A		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.19	S	Y	Y	Allow submission.	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 585 - Lake Ohakuri Northwest Riparian Faces	16	16.01	McPherson, D		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.31	O	Y	Y	Disallow the submission point. Retain site as SNA as per Director General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	16	16.01	McPherson, D		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.20	S	Y	Y	Allow submission.	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 585 - Lake Ohakuri Northwest Riparian Faces	17	17.01	McPherson, K		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.32	O	Y	Y	Disallow the submission point. Retain site as SNA as per Director General's submission	site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	17	17.01	McPherson, K		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.21	S	Y	Y	Allow submission	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 583 - Lake Atiamuri South Faces	18	18.01	Mercury NZ Ltd. (Mercury)	<a href="mailto:fraser.graafhuis@mercury.co.nz">fraser.graafhuis@mercury.co.nz</a> 027 491 0867	S	Y	N	Retain SNA provided Rule 15.5.6 continues to apply.	SNA #583 is located under existing 220kv high voltage National Grid lines which connect Ohakuri to Edgecumbe. The national grid lines are located within Ohakuri electricity generation core site, however the lines are owned and operated by Transpower. Correspondence established prior to notification confirms Mercury does not object to the SNA area within the Ohakuri electricity generation core site on the basis that vegetation is able to be pruned and trimmed under infrastructure, as provided for by permitted activity Rule 15.5.6.	Forest and Bird	8	8.76	O	Y	Y	Disallow submission. That all areas meeting the criteria for significance be mapped as SNAs to give effect to the RPS. We oppose removal of part of an SNA area.	Maintenance activities need to be considered in the context of the area as an SNA.
Site 585 - Lake Ohakuri Northwest Riparian Faces	18	18.02	Mercury NZ Ltd. (Mercury)	<a href="mailto:fraser.graafhuis@mercury.co.nz">fraser.graafhuis@mercury.co.nz</a>	S	Y	N	Support SNA 585 subject to removal of SNA over Ohakuri diversion tunnel (shown in orange) this is to be excluded as located above diversion tunnel	Mercury generally supports the proposed SNA area (Area 1 in picture), with the exception of the SNA shown in orange located above Ohakuri diversion tunnel, which is anticipated will be removed. Dam safety is paramount. Mercury considers an SNA over hydro electricity generation infrastructure has the potential to constrain future maintenance activities within the Ohakuri electricity generation core site.	Forest and Bird	8	8.77	O	Y	Y	Disallow submission. That all areas meeting the criteria for significance be mapped as SNAs to give effect to the RPS. We oppose removal of part of an SNA area.	Maintenance activities need to be considered in the context of the area as an SNA.
Site 679 - Te Waerenga Road 2	19	19.01	Moyle, W & Lane, C	<a href="mailto:warwick5369@gmail.com">warwick5369@gmail.com</a>	S	Y	N	Do not include the area 89, 119 and 119A Kaharoa Road a shared forest remnant that also extends on the road reserve, total c.2.3ha in the District Plan as SNA.	The rules are unnecessary for our properties as the areas are physically protected by topography. Furthermore, the vegetation provides value to our small lifestyle properties and is at low risk of disturbance. We have all taken initiatives as our own expense to protect our small sections of bush through fencing, trapping and removing weeds while also entering into a memorandum of understanding to ensure we continue to improve the ecological value of our properties by protecting the natural vegetation. We feel imposition of an SNA is an unnecessary interference with our rights as property owners. We are concerned about how the rules may evolve in the future and area actually counterproductive by creating a sense of uncertainty. Our small remnant located on our small lifestyle properties at 89, 119 and 119A is at no risk of disturbance, as we see it as an amenity that adds significant value to our property.	Director General of Conservation	5	5.11	O	Y	Y	Disallow submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken
Site 155 - Horohoro Forest East	20	20.01	Northdale Holdings Ltd. & Martin, R		O	Y		[Do not proceed with SNA 155]	The Martin family have owned this property since 1972, where we have farmed and been kaitiaki for the land, protecting the native flora and fauna, setting traps for pest control and killing deer, goats and possums. SNA does not have any fencing around it but had a natural geographic barrier that prevented stock entering 80% of the area. The unprotected area was used as winter protection for sheep. With climatic change and very hot summer days the sheep have become sunburnt after shearing and the shade trees are a huge asset to our stock husbandry. We feel we have transformed the property into a Significant Area. There is also concern that this land houses an urupa where our ancestors are buried. Our whanau consists of six generations of farming in the area and if it became an SNA this would be very impactful. The submitter finds it perverse that the area is potentially taken out of the control of the Owner and Custodian. We do not agree with rate compensation, but would consider selling SNA 155 at the value of a Heritage Site. The treasured area of our family land, that you have identified as a potential SNA 155 we are going to retain our land not be open for Public Access under any circumstances, but be the Crown in our Jewel of the Mamaku Scenic Reserve. We are prepared to instigate that the recorded proposed area SNA 155 have covenants placed over the Registered Title over the property so that it is complying to conditions that it cannot be removed, or damaged unless of an Act of God.	Director General of Conservation	5	5.12	O	Y	Y	Disallow submission. Schedule the entire area of Site 155 as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken

i) Incentives and support	20	20.02	Northdale Holdings Ltd. & Martin, R		O	Y		Allow the normal three yearly valuation process to take place, the land owner then has the opportunity to oppose or accept the new valuations. Therefore it is independent assessment and does not involve the Council with Administration costs.	I totally disagree with the whole concept of the Rotorua District Council being involved in Rate setting for compensation by way of \$5.00 per hectare. This is a messy and clumsy way of administration.									
Site 681 - Mangorewa Kaharoa	21	21.01	Pukahukiwi Kaokaoroa Incorporation	<a href="mailto:shuja@deloitte.co.nz">shuja@deloitte.co.nz</a>	O	N	N	We would like to explore other options [in regards to the incorporation's property at SH 33] with the Council that will achieve the same outcomes that have been proposed under Plan Change 3. We require further information and time to engage independent advice and to seek financial assistance for this process to occur. The Committee of Management would welcome further engagement going forward around this matter and remind the Council of its obligations under the Treaty of Waitangi.	We understand the steps that the Council are undertaking in the protection of wetlands and native fauna and flora but argue that the process undermines the Committee's right to govern its own affairs. We acknowledge attempts to contact the Committee and apologise for the delayed response.	Director General of Conservation	5	5.13	O	Y	Y	Disallow submission point. Schedule the identified area as per Director-General's submission subsequent to a field check of site to further ascertain if smaller areas identified are significant	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
a) General	22	22.01	Raukawa Charitable Trust	<a href="mailto:environment@rauakawa.org.nz">environment@rauakawa.org.nz</a>	S	Y	Y	The Plan Change is supported and the Trust seeks that it be approved by the Council.	The Trust supports aspects of the proposed plan change - The protection of areas of indigenous riparian vegetation, wetlands and significant terrestrial indigenous habitat and vegetation; and the continued provision for cultural harvest in accordance with Māori customs and values. The Trust considers that the plan change will help achieve the restoration and protection of water quality; the restoration and protection of the relationships of Waikato River iwi according to their tikanga and kawa with the Waikato River; and the protection and enhancement of significant sites, fisheries, flora and fauna. Te Ture Whaimana o te Awa o Waikato is the primary direction setting document for the Waikato River and activities within the catchment affecting the Waikato River - of particular relevance are objectives A to M [refer to full submission]. The trust seeks that the plan change provisions giving effect to the objectives of Te Ture Whaimana be retained and approved. Te Rautaki Taiao a Raukawa - Raukawa Environmental Management Plan (Te Rautaki) has sections relevant to the application									
a) General	23	23.01	Rotorua Rural Community Board	<a href="mailto:Shirley.Trumper@rotorualc.nz">Shirley.Trumper@rotorualc.nz</a>	O	Y		Take the approach outlined to SNAs	The RCB is supportive of the concept and broad objectives of protecting and preserving of genuine SNAs especially where a risk of extinction can be demonstrated. Our support for this concept is conditional as follows: A) that the definitions of each of the two words "significant" and "natural" are clearly defined, agreed and not left open to interpretation or misinterpretation by those responsible for enacting and/or enforcing the plan change in practice. B) that the benefits to the public are weighed against both the capital value losses and operating income losses to the landowner where encumbrances affect the prior existing use of the land. C) No SNA should be enacted without full compensation of capital value and operating losses accruing to the landowner resulting from such encumbrances. This should apply equally, whether any SNA be enacted voluntarily or imposed by regulation. D) Any and all SNAs should only apply under a voluntary individual landowner agreement basis.	Forest and Bird	8	8.87	O	Y	Y	Oppose submission.	All potential SNAs should be mapped and defined as SNAs. Removing SNA status from sites that have other protection via covenant fails to give effect to criteria in the WRPS.	
a) General	23	23.01	Rotorua Rural Community Board	<a href="mailto:Shirley.Trumper@rotorualc.nz">Shirley.Trumper@rotorualc.nz</a>	O	Y		Take the approach outlined to SNAs	The RCB is supportive of the concept and broad objectives of protecting and preserving of genuine SNAs especially where a risk of extinction can be demonstrated. Our support for this concept is conditional as follows: A) that the definitions of each of the two words "significant" and "natural" are clearly defined, agreed and not left open to interpretation or misinterpretation by those responsible for enacting and/or enforcing the plan change in practice. B) that the benefits to the public are weighed against both the capital value losses and operating income losses to the landowner where encumbrances affect the prior existing use of the land. C) No SNA should be enacted without full compensation of capital value and operating losses accruing to the landowner resulting from such encumbrances. This should apply equally, whether any SNA be enacted voluntarily or imposed by regulation. D) Any and all SNAs should only apply under a voluntary individual landowner agreement basis.	C & W Tozer	12	12.05	S (in part)	Y	Y	That the definitions of 'Significant' and 'Natural' need to be clear and not open to subjective interpretation.	We consider that the Rotorua Community Board has raised a valid point about possible landowner loss of property capital value following an SNA being imposed. Compensation paid to the landowner for this loss (in the interests of a 'public good' demanded by the District and Regional ratepayers), is not inappropriate – particularly if Council fails to provide impacted landowners with meaningful long-term SNA protection/restoration assistance. Such assistance should be by way of pest plant Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.	
Site 567 - Golden Springs	14	14.01	Submitter 14		O	N	Y	Council provide clear information that is easy to understand about what an SNA actually means in real terms for landowners. What are rights, obligations, benefits, losses? What is the purpose?	Property boundaries at 5087 State Highway 5 are incorrect and should be shown properly. We are not convinced the intended SNA is even on the property. We cannot be expected to make decisions based on guesswork. Due diligence has not been done by Council. Communication was ineffective. There is no need for Council to have any control over this private land.	Federated Farmers	6	6.18	S	Y	Y	Allow submission.		
Site 567 - Golden Springs	14	14.01	Submitter 14		O	N	Y	Council provide clear information that is easy to understand about what an SNA actually means in real terms for landowners. What are rights, obligations, benefits, losses? What is the purpose?	Property boundaries at 5087 State Highway 5 are incorrect and should be shown properly. We are not convinced the intended SNA is even on the property. We cannot be expected to make decisions based on guesswork. Due diligence has not been done by Council. Communication was ineffective. There is no need for Council to have any control over this private land.	Waikato Regional Council	13	13.04	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as both regionally and locally significant without need for further study. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity. Council's main concerns is the protection and sustainable management of the geothermal stream.	
Site 558 - Akatārewa Stream	24	24.01	Te Kopia Forest Partnership	<a href="mailto:brett@rfh.co.nz">brett@rfh.co.nz</a>	O	N	Y	Remove or adjust areas identified as SNA 558.	The areas identified do not contain indigenous vegetation and significant habitats of indigenous fauna, as they are planted in pine forest.	Director General of Conservation	5	5.14	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
Site 558 - Akatārewa Stream	24	24.01	Te Kopia Forest Partnership	<a href="mailto:brett@rfh.co.nz">brett@rfh.co.nz</a>	O	N	Y	Remove or adjust areas identified as SNA 558.	The areas identified do not contain indigenous vegetation and significant habitats of indigenous fauna, as they are planted in pine forest.	Waikato Regional Council	13	13.05	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as regionally significant without need for further field work. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity. Council's main concerns is the protection and sustainable management of the geothermal stream.	
Site 590 - Waihunu Arm Riparian Faces and Wetland	24	24.02	Te Kopia Forest Partnership	<a href="mailto:brett@rfh.co.nz">brett@rfh.co.nz</a>	O	N	Y	Remove or adjust areas identified as SNA 590.	The areas identified do not contain indigenous vegetation and significant habitats of indigenous fauna, as they are planted in pine forest.	Director General of Conservation	5	5.15	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
Site 592 - Ōrākeikōrako Extension (Excludes Geothermal Areas)	24	24.03	Te Kopia Forest Partnership	<a href="mailto:brett@rfh.co.nz">brett@rfh.co.nz</a>	O	N	Y	Remove or adjust areas identified as SNA 592.	The areas identified do not contain indigenous vegetation and significant habitats of indigenous fauna, as they are planted in pine forest.	Director General of Conservation	5	5.16	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	

Site 154 - Te Miri Road	25	25.01	Te Rimu Trust	<a href="mailto:office@nzsurveys.co.nz">office@nzsurveys.co.nz</a>	O	Y	Y	The SNA identified on their property [72 Te Manu Road] is removed on the grounds it is only covered by minor scrub not an area of "significant indigenous vegetation".	The landowners intend to continue to graze the pockets of indigenous vegetation and winter stock under them and the multiple access tracks through them will be continued to be required. We understand [a SNA map] was initially sent to the landowner and they comment about the pasture tracts being included. This was then revised (as a desktop GIS exercise by Wildlands) to the version that was sent with the invitation to submit on the plan change. It is unclear what (if any) fieldwork was done. Using visual inspection from the landowner's property and the public road and reviewing the latest aerial imagery in Geyser view - the stands of indigenous vegetation on 73, 89A, 89B, 101, 112B and 121 Te Manu Road are considerably different in scale and use to the pockets on 72 Te Manu Road. The revised map still includes areas of open pasture visible from aerial imagery. The significance justification is weaker than for other areas in the district and as identified above the pockets of indigenous vegetation on the landowner's property are less valuable than the larger areas on other properties that make up the majority of SNA 154. While there are other areas of SNA 154 that with reasonable stands are more likely to be considered significant, these are not located on the landowner's property. The limited amount of rates remission likely to be calculated could not be considered a meaningful incentive. They support the view of the Rotorua Rural community Board that top-down impositions by statutory authorities are less desirable than a bottom up volunteer approach. Council need to be actively obtaining permission from the landowners that they are willing to have the restrictions imposed. The landowners are happy to maintain the pockets of indigenous vegetation as they have for many years but do not want SNA controls imposed on areas that do not appear to meet the threshold of "significant" and will likely impose significant management/compliance burdens on them.	Director General of Conservation	5	5.17	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken
Site 700 - Mangaharakeke Waterfall	26	26.01	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 700] is not classified as a SNA. The area containing significant vegetation is overstated. Many sub-parts are dominated by weeds. Vegetation on at least one landform does not meet the Waikato RPS criteria. The intent of the Waikato RPS, objective 3.19, policy 11.2 and methods 11.2.1 – 3 can be met without an SNA. Most relevant is method 11.2.2. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the Waikato RPS method (11.2.2.a), therefore the cascade of avoidance, mitigation and offset (11.2.2.b-d) is not required. The site contains no rare, at risk, threatened or irreplaceable indigenous biodiversity (11.2.2.f); and the activity of plantation forestry located next to the site (11.2.2.g) if anything performs a protective function, in that the biggest risk appears to be domestic animals, deduced from the regional council seeking to fence all wetlands in this catchment. Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Note: Appendix 9 2.3.3.b of the District Plan identifies that the clearance of indigenous vegetation <i>within</i> SNA shall be: vegetation that is in an area subject to management by entities that have certification under Forest Stewardship Council Certification, which Timberlands holds. However as the NES-PF is more stringent than the District Plan in this regard, the NES-PF provisions prevail. The protective status of an SNA does not address the predominant risk to this site – plant and animal pests. Council does not identify how an SNA gives greater protection. The section 32 report states "On private land the main causes of decline are <b>habitat destruction or modification</b> through the removal, fragmentation and degradation of ecosystems, wetland drainage and the effects of pests and weeds." The risks either do not apply to this land in the context of FSC certified forest practice, or the SNA status does not address the risks identified (e.g. active pest control). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer to the site. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.2 which is to Support the integrity of Significant Natural Areas and habitat of indigenous fauna by provision of buffers around SNAs. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site.	Director General of Conservation	5	5.21	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in BOP. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
Site 700 - Mangaharakeke Waterfall	26	26.01	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 700] is not classified as a SNA. The area containing significant vegetation is overstated. Many sub-parts are dominated by weeds. Vegetation on at least one landform does not meet the Waikato RPS criteria. The intent of the Waikato RPS, objective 3.19, policy 11.2 and methods 11.2.1 – 3 can be met without an SNA. Most relevant is method 11.2.2. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the Waikato RPS method (11.2.2.a), therefore the cascade of avoidance, mitigation and offset (11.2.2.b-d) is not required. The site contains no rare, at risk, threatened or irreplaceable indigenous biodiversity (11.2.2.f); and the activity of plantation forestry located next to the site (11.2.2.g) if anything performs a protective function, in that the biggest risk appears to be domestic animals, deduced from the regional council seeking to fence all wetlands in this catchment. Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Note: Appendix 9 2.3.3.b of the District Plan identifies that the clearance of indigenous vegetation <i>within</i> SNA shall be: vegetation that is in an area subject to management by entities that have certification under Forest Stewardship Council Certification, which Timberlands holds. However as the NES-PF is more stringent than the District Plan in this regard, the NES-PF provisions prevail. The protective status of an SNA does not address the predominant risk to this site – plant and animal pests. Council does not identify how an SNA gives greater protection. The section 32 report states "On private land the main causes of decline are <b>habitat destruction or modification</b> through the removal, fragmentation and degradation of ecosystems, wetland drainage and the effects of pests and weeds." The risks either do not apply to this land in the context of FSC certified forest practice, or the SNA status does not address the risks identified (e.g. active pest control). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer to the site. Plantation forestry on adjacent land will not lead to loss of protection of the site identified in the District Plan's Policy 2.3.5.2 which is to Support the integrity of Significant Natural Areas and habitat of indigenous fauna by provision of buffers around SNAs. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site.	Waikato Regional Council	13	13.06	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant based on aerial photographs and personal knowledge. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity.	
Site 701 - Mangaharakeke Wetland	26	26.02	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	That the boundary of the proposed SNA 701 site is revised to ensure that it is topographically accurate compared to the vegetation that could be regarded as genuinely significant, in a way that is practical for operational purposes. Vegetation does not all meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see NES-PF regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Director General of Conservation	5	5.23	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Wetlands are National Priority 2 in the Priorities for Protecting Rare and Threatened Biodiversity on Private Land (MFE 2007) and are significantly reduced in area in BOP. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
Site 701 - Mangaharakeke Wetland	26	26.02	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	That the boundary of the proposed SNA 701 site is revised to ensure that it is topographically accurate compared to the vegetation that could be regarded as genuinely significant, in a way that is practical for operational purposes. Vegetation does not all meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Regulation under the National Environmental Standards for Plantation Forestry (NES-PF) already applies to riparian margins and wetlands. These require setbacks for planting, replanting, crossings, harvesting, mechanical land prep and earthworks near a stream or wetland (see NES-PF regulations 14, 20, 29, 36-49, 54, 68, 74, 78, 93-94, and Schedule 3). Plantation forestry on adjacent land will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Waikato Regional Council	13	13.07	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant based on aerial photographs and personal knowledge. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity. Mapping of the wetland will also assist landowners in identifying zones subject to inspection requirements under the proposed National Policy Statement for Freshwater Management (re. Proposed NPSFM 3.15(5)(a)(i-iii)).	



Site 703 - Torepatutahi Stream Riparian	26	26.03	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Director General of Conservation	5	5.25	O	Y	Y	Disallow submission. Retain site as SNA as per Director-General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 703 - Torepatutahi Stream Riparian	26	26.03	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	C & W Tozer	12	12.06	S	Y	Y	Allow Submission	That site #703 not be classified as an SNA for the reasons outlined by the submitter.
Site 703 - Torepatutahi Stream Riparian	26	26.03	Timberlands Ltd. (Timberlands)	<a href="mailto:bridget@eland.co.nz">bridget@eland.co.nz</a>	O	Y	Y	This site [SNA 703] is not classified as a SNA.	It is a dry gully system except in periods of heavy rain and not riparian. Thus it does not meet RMA s6(a). Nor is the vegetation significant thus it does not meet RMA s6(c). Forest activities will not have a significant effect in any case, so classifying it as SNA will not provide extra protection from what it already receives under the Forestry Management Plan, The Plantation Forestry NES and the requirements of the FSC Certification. SNA classification would introduce another layer of compliance assessment with no additional benefit. Vegetation does not meet the Waikato RPS criteria for significance. Plantation forestry on adjacent land will not lead to loss of protection of the site (identified in the Waikato RPS method 11.2.2). Plantation forestry on land adjacent to this unstocked site will not lead to loss of protection of the site identified in District Plan policy 2.3.5.1 as the ecological sustainability or values are not at risk as a result of forest practice. There will be no net loss of biodiversity as a result of forest practice. There will be no building or development setbacks to affect the health and functioning of the site. The forest and fence around the forest provides a buffer. The land ownership, as a result of the 2008 CNI Settlement now reflects the Māori, historical and community association with the site. There is a view that an SNA status reduces that association. The National Policy Statement on Indigenous Biodiversity (2018) is a pre consultation draft, thus its weight must be limited.	Waikato Regional Council	13	13.08	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant and important based on field work. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity.
Site 703 - Torepatutahi Stream Riparian	27	27.01	Tozer, C and W	<a href="mailto:tozer@slingshot.co.nz">tozer@slingshot.co.nz</a>	O	Y	N	Do not schedule/do not include #703 "Short Road Gully" proposed SNA in the District Plan.	1. Our property land cover and its management help protect the headwaters of the Torepatutahi Stream. We consider our Short Road Gully and its natural resources are adequately protected without an SNA 2. During the past 25 years we have respected, cared for and encouraged the growth of indigenous vegetation. We are concerned that Council now want to schedule the majority of our property by way of an SNA with all of the restrictions, extra costs and loss of property rights that this would bring. 3. Wildland Consultants in their 1998 ecological survey for Council did not identify our property as a site of ecological significance. Their 2018 assessment records "Wildling pines scattered throughout kanuka forest"; and that no threatened or at-risk species were observed. Risk assessment to site vegetation clearance was recorded as "low". Furthermore, change relative to the 1998 report is unknown, likely to be minor. This does not justify a large percentage of our property being proposed as a new SNA. 4. We dispute assessment of risk of wildling pines and other pest plants in the Wildland 2018 report. Wildling pines are a definite risk in the locality and threaten biodiversity in parts of the property. The risk posed by blackberry is very high and by our observation and first-hand experience, is the greatest threat to indigenous vegetation establishment, recovery and succession in the Central North Island. 5. To maintain and enhance the integrity of this indigenous vegetation and associated biodiversity requires very active and repeated pest plant and pest animal control. Just locking up an area as an SNA and hoping the indigenous flora and fauna will flourish in the Torepatutahi Catchment and beyond is wishful thinking at best. 6. We believe we are unlikely to receive much needed financial and physical assistance to help protect, maintain and enhance the SNA areas. To place these areas in an SNA and biodiversity protected in-perpetuity, we need realistic meaningful rates relief and financial and physical contribution towards annual and on going plant and animal pest control. Without such assistance, our land and many SNA's in the District will not be managed and plant and animal pests will overrun and degrade the areas to the point of loss. 7. We contend a better approach would be for Rotorua Lakes Council and Waikato Regional Council to jointly partner with the landowner in providing an alternative to SNA's – namely a tailored Property Environmental Plan and agreement which embraces a balance of environmental protection, production and recreational uses and values for the land in question.	Director General of Conservation	5	5.18	O	Y	Y	Disallow submission. Schedule the area as per Director-Generals submission.	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken
Site 703 - Torepatutahi Stream Riparian	27	27.01	Tozer, C and W	<a href="mailto:tozer@slingshot.co.nz">tozer@slingshot.co.nz</a>	O	Y	N	Do not schedule/do not include #703 "Short Road Gully" proposed SNA in the District Plan.	1. Our property land cover and its management help protect the headwaters of the Torepatutahi Stream. We consider our Short Road Gully and its natural resources are adequately protected without an SNA 2. During the past 25 years we have respected, cared for and encouraged the growth of indigenous vegetation. We are concerned that Council now want to schedule the majority of our property by way of an SNA with all of the restrictions, extra costs and loss of property rights that this would bring. 3. Wildland Consultants in their 1998 ecological survey for Council did not identify our property as a site of ecological significance. Their 2018 assessment records "Wildling pines scattered throughout kanuka forest"; and that no threatened or at-risk species were observed. Risk assessment to site vegetation clearance was recorded as "low". Furthermore, change relative to the 1998 report is unknown, likely to be minor. This does not justify a large percentage of our property being proposed as a new SNA. 4. We dispute assessment of risk of wildling pines and other pest plants in the Wildland 2018 report. Wildling pines are a definite risk in the locality and threaten biodiversity in parts of the property. The risk posed by blackberry is very high and by our observation and first-hand experience, is the greatest threat to indigenous vegetation establishment, recovery and succession in the Central North Island. 5. To maintain and enhance the integrity of this indigenous vegetation and associated biodiversity requires very active and repeated pest plant and pest animal control. Just locking up an area as an SNA and hoping the indigenous flora and fauna will flourish in the Torepatutahi Catchment and beyond is wishful thinking at best. 6. We believe we are unlikely to receive much needed financial and physical assistance to help protect, maintain and enhance the SNA areas. To place these areas in an SNA and biodiversity protected in-perpetuity, we need realistic meaningful rates relief and financial and physical contribution towards annual and on going plant and animal pest control. Without such assistance, our land and many SNA's in the District will not be managed and plant and animal pests will overrun and degrade the areas to the point of loss. 7. We contend a better approach would be for Rotorua Lakes Council and Waikato Regional Council to jointly partner with the landowner in providing an alternative to SNA's – namely a tailored Property Environmental Plan and agreement which embraces a balance of environmental protection, production and recreational uses and values for the land in question.	Waikato Regional Council	13	13.09	O	Y	Y	That the site be retained and mapped as SNA applying relevant WRPS criteria.	Wildlands background ecological report (2014) identifies the site as locally significant and important based on field work. The study undertaken as part of the background report represents an appropriate degree of site validation. The site meets one or more of the Waikato RPS criteria for determining significance of indigenous biodiversity.



Site 585 - Lake Ohakuri Northwest Riparian Faces	28	28.01	Uttinger, S	<a href="mailto:ria_uttinger@hotmail.com">ria_uttinger@hotmail.com</a>	O	N	Y	Reverse decision to make the proposed area [at 388 Maleme Road] a significant natural area.	This farm was previously in Gum trees and this area as shown on map of the SNA has still got gum trees on it and has been fenced off for the last 10 years so stock don't get into it. We want access to this land to use the gum trees for firewood in the future. It is not used for stock but we would prefer to maintain this area ourselves. We are happy to plant flaxes on this land but would prefer to keep this area under our farming practice. It is 1.5ha.	Director General of Conservation	5	5.19	S	Y	Y	Allow submission subject to groundtruthing. Remove area of gum trees on this property from SNA	Area appears to be dominated by gum trees. Groundtruthing is required to confirm this.
Site 585 - Lake Ohakuri Northwest Riparian Faces	28	28.01	Uttinger, S	<a href="mailto:ria_uttinger@hotmail.com">ria_uttinger@hotmail.com</a>	O	N	Y	Reverse decision to make the proposed area [at 388 Maleme Road] a significant natural area.	This farm was previously in Gum trees and this area as shown on map of the SNA has still got gum trees on it and has been fenced off for the last 10 years so stock don't get into it. We want access to this land to use the gum trees for firewood in the future. It is not used for stock but we would prefer to maintain this area ourselves. We are happy to plant flaxes on this land but would prefer to keep this area under our farming practice. It is 1.5ha.	Federated Farmers	6	6.22	S	Y	Y	Allow submission.	This is consistent with the relief sought in our submission.
Site 585 - Lake Ohakuri Northwest Riparian Faces	31	31.01	van Maanen, C		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.33	O	Y	Y	Disallow submission point. Retain site as SNA as per Director General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	31	31.01	van Maanen, C		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.23	S	Y	Y	Allow submission.	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 585 - Lake Ohakuri Northwest Riparian Faces	32	32.01	van Maanen, G		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.34	O	Y	Y	Disallow submission point. Retain site as SNA as per Director General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	32	32.01	van Maanen, G		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.24	S	Y	Y	Allow submission.	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 585 - Lake Ohakuri Northwest Riparian Faces	33	33.01	van Maanen, M		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Director General of Conservation	5	5.35	O	Y	Y	Disallow submission point. Retain site as SNA as per Director General's submission	Site contains significant indigenous vegetation. The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken.
Site 585 - Lake Ohakuri Northwest Riparian Faces	33	33.01	van Maanen, M		O	Y	Y	Remove the 10ha affected at 890 Poutakataka Road from SNA 585 Lake Ohakuri Northwest Riparian Faces.	The first notification of this proposed plan change came on 29/7/19. There has been no opportunity to identify the economic & practical ramifications this will have on farming practice & management. There is little indigenous vegetation in the 10ha identified at 890 Poutakataka Road. Blackberry & wilding pines are rampant & destruction by pigs & possums is extensive. I am concerned that inadequate investigation has been completed to support the identification of the SNA as Wildlands have not visited the site.	Federated Farmers	6	6.25	S	Y	Y	Allow submission.	Support is extended for the request to have further assessment undertaken to determine the accuracy of the SNA identification and mapping process.
Site 708 - Tokerau Wetland A	29	29.01	Vercoe, B	<a href="mailto:b.vercoe@outlook.com">b.vercoe@outlook.com</a>	O	N		Support SNA 708 with amendment to allow for the Trust to increase the watercress growth and allow controlled access to harvest it.	The two wetlands are very old and have been kept in a protected state and will continue to be under the jurisdiction of the Tokerau A.11 Trust. This is nurtured as an important source of food (watercress growth). We are aware of the unique flora & native trees in both SNA areas.								
Site 709 - Tokerau Wetland B	29	29.02	Vercoe, B	<a href="mailto:b.vercoe@outlook.com">b.vercoe@outlook.com</a>	O	N		Support SNA 709 with amendment to allow for the Trust to increase the watercress growth and allow controlled access to harvest it.	The two wetlands are very old and have been kept in a protected state and will continue to be under the jurisdiction of the Tokerau A.11 Trust. This is nurtured as an important source of food (watercress growth). We are aware of the unique flora & native trees in both SNA areas.								
Site 681 - Mangorewa Kaharoa	30	30.01	Waerenga East and West Incorporation (Committee of)	<a href="mailto:nzrotoruaenquiries@deloitte.co.nz">nzrotoruaenquiries@deloitte.co.nz</a>	O			Request further information and time to consider the proposal and understand what the incorporations options are for alternative means of protecting the true SNAs moving forward.	Further consultation be held as the proposed area includes existing exotic tree plantations and a number of other issues. Also we received insufficient notice to receive the proposed changes, seek professional advice and formulate an informed response.								
f) Sites with alternative legal protection (general points)	34	34.01	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	That scheduling and subsequent control on activities relies on assessment based on WRPS criteria in Table 11-2	Removing SNA status from sites due to alternative protection from covenants is inconsistent with the application of significance criteria in the RPS. Covenanting agreements only go so far in meeting the obligations of protection contained in section 6(c) of the RMA. Criteria for determining significance are outlined in Table 11-1 of the WRPS. Criterion 1 identifies indigenous vegetation or habitat of indigenous fauna that is currently or recommended to be set aside by statute or covenant as an SNA as long as it also meets at least one of criteria 3-11. In the case of geothermal vegetation or habitat in all cases it will also meet criterion 5 (as a minimum). Removing SNA status means sites are not subject to policies or rules of the District Plan. Removing SNA status can also remove potential for landowners to access funding to improve management of those sites. Protection via covenant does not preclude the possibility of people to apply for resource consent for activities that would adversely affect the SNA. Furthermore, the flexibility of the terms of a covenant means these might not always meet what Council considers important for biodiversity. In some cases certain activities provided for in a covenant might meet the threshold for more stringent controls under the resource management framework, e.g. a covenant allowing an activity that might otherwise be classed as non-compliant.	Federated Farmers	6	6.26	O	Y	Y	Disallow submission.	FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data or improved biodiversity outcomes. The relief sought in FFNZ submission can address the issues raised concerning access to funding.
c) New and amended geothermal sites (general points)	34	34.03	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	That all areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNAs. That specific sites be included and scheduling be amended (refer to other submission points).	WRC's previous submission on matters related to SNAs in the RLC plan sought the inclusion of many geothermal areas in the SNA maps. Several of these were excluded or only partially included. The proposed scheduling and mapping of SNAs excludes areas that have other protection such as reserve status.	Federated Farmers	6	6.27	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.
e) Sites reassessed at request of landowner (general points)	34	34.04	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	That specific sites be included and scheduling be amended (refer to other submission points).	Appropriate application of WRPS criteria is necessary. Council supports the inclusion of all areas identified in the report and seeks boundary readjustments and further inclusions.	Federated Farmers	6	6.28	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.

Site 552 - Horohoro Geothermal area	34	34.05	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments to SNA 552.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 555 - Waiotapu South	34	34.06	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	Addition of the entire site for SNA 555.	All areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNA.	Federated Farmers	6	6.29	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.	
Site 558 - Akatārewa Stream	34	34.07	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	Addition of entire site including the stream length for SNA 558.	All areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNA. The notified plan change added the area at the mouth but does not include the stream length.	Federated Farmers	6	6.30	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.	
Site 567 - Golden Springs	34	34.08	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 567.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 568 - Waikato River Springs	34	34.09	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 568.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 571 - Wharepapa Road	34	34.10	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 571.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 572 - Ngāpouri	34	34.11	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 572.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 573 - Waiotapu North	34	34.12	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 573.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 574 - Waikite Valley	34	34.13	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt proposed amendments for SNA 574.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 716 - Maungakakara meā (Rainbow Mountain)	34	34.14	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	Addition of entire site for SNA 716.	The area in the southwest should be included as part of the wider geothermal area. The area identified in the northeast is actually in the Bay of Plenty region, not the Waikato region as stated.									
Site 559 - Ōrakeikōrako	34	34.15	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	Retention of entire site for SNA 559.	(East side of Waikato river only). WRC notes Orakei Conservation Covenants, Section 77 Reserves Act 1977. Removing SNA status from sites due to alternative protection from covenants is inconsistent with the application of significance criteria in the RPS (refer to submission point on alternative legal protection and removal of SNAs).	Director General of Conservation	5	5.26	S	Y	Y	Allow the submission point subject to groundtruthing. Schedule the area including covenants, reserves, if significance criteria is met.	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Groundtruthing is required to confirm this.	
Site 566 - Red Hills Geothermal area	34	34.16	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	Retention of entire site for SNA 566.	WRC notes Orakei Korako Conservation Covenants, Section 77 Reserves Act 1977. Removing SNA status from sites due to alternative protection from covenants is inconsistent with the application of significance criteria in the RPS (refer to submission point on alternative legal protection and removal of SNAs).	Director General of Conservation	5	5.27	S	Y	Y	Allow the submission point subject to groundtruthing. Schedule the area including covenants, reserves, if significance criteria is met.	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Groundtruthing is required to confirm this.	
Site 570 - Longview Road Thermal Area	34	34.17	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	O	Y	Y	Retention of entire site for SNA 570.	WRC notes Molloy Conservation Covenant. Removing SNA status from sites due to alternative protection from covenants is inconsistent with the application of significance criteria in the RPS (refer to submission point on alternative legal protection and removal of SNAs).	Director General of Conservation	5	5.28	S	Y	Y	Allow the submission point subject to groundtruthing. Schedule the area including covenants, reserves, if significance criteria is met.	The Director-General agrees that all sites that meet the significance criteria in the WRPS and BOPRPS must be included as SNAs. Groundtruthing is required to confirm this.	
Site 710 - Akatārewa East	34	34.18	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 710.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 712 - Te Kopia	34	34.19	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	Add the entire site for SNA 712.	The mapping covers only a very small part of the SNA. The remainder is reserve and is not mapped as an SNA by RLC. All areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNA.	Federated Farmers	6	6.31	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.	
Site 713 - Mangamingi Station	34	34.20	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 713.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 714 - Matapan Road	34	34.21	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 714.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 715 - Ohaaki Steamfield East	34	34.22	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	Add the entire site for SNA 715.	The mapping covers only a very small part of the SNA. The remainder is in a QEII covenant and is not mapped as an SNA by RLC. All areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNA.	Federated Farmers	6	6.32	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process. FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data or improved biodiversity outcomes.	
Site 717 - Upper Atiamuri West	34	34.23	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 717.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 718 - Western Te Kopia	34	34.24	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 718.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
Site 800 - Northern Paeroa Range	34	34.25	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	SA	Y	Y	Add the entire site for SNA 800.	The mapping covers only apart of the SNA. The remainder is reserve and is not mapped as an SNA by RLC. All areas of geothermal vegetation that fall within the Council's boundary for RLC be mapped as SNA.	Federated Farmers	6	6.33	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process.	

Site 801 - Murphy's Springs	34	34.26	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>	S	Y	Y	Adopt the proposed amendments for SNA 801.	WRC supports RLC's effort to update the District Plan and ensure the appropriate level of management of activities within SNAs.									
h) Other sites not in scope of notified plan change	34	34.27	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>		Y	Y	Add the following sites covered by scenic reserves and conservation areas: (including non-geothermal land) noted in Wildlands 2014 report: Te Kopia, Waikite, Maungaongaonga, Waiotapu North, Maungakakamea (Rainbow Mountain) and Waiotapu South (refer to full submission for maps).	The proposed scheduling and mapping of SNAs should not exclude areas that have other protection such as reserve status.	Federated Farmers	6	6.34	O	Y	Y	Disallow submission.	Sites should only be brought into the district plan and subject to controls relating to SNAs and SGFs after a robust identification and landowner consultation process. FFNZ does not accept that sites with existing legal protection, in particular, QE11 covenants, are at risk of losing that protection. A QE11 covenant protects the land in perpetuity. It cannot be removed for any reason. The sites with legal protection can still form part of a district biodiversity dataset, they do not need to be identified as an SNA to achieve completeness of data or improved biodiversity outcomes	
h) Other sites not in scope of notified plan change	34	34.28	Waikato Regional Council (WRC)	<a href="mailto:Alejandro.Cifuentes@waikato.region.govt.nz">Alejandro.Cifuentes@waikato.region.govt.nz</a>		Y	Y	WRC recommends that RLC includes in its schedule of SNAs all areas within Department of Conservation Estate that meet the criteria in table 11-1 of the WRPS. Such inclusion creates an appropriate contingency in the event of treaty settlement land transfers. Having SNAs on transferred land will ensure that activities are appropriately managed under the RMA, after the land ceases to have a protected status under the Conservation Act. This also makes it easier for landowners to access funding to improve management of those sites.										
Various	34	34.01 - 34.28	Waikato Regional Council (WRC)					Refer to points mentioned above in submission points #34.01 - #34.28	Refer to points mentioned above in submission points #34.01 - #34.28	Forest and Bird	8	8.88-8.115	S	Y	Y	Allow submission.	We support the recommendation RLC includes in its schedule of SNAs all areas within Department of Conservation Estate that meet the criteria in table 11-1 of the WRPS.	
Site 679 - Te Waerenga Road 2	35	35.01	Walshe, B	<a href="mailto:brett@bsk.co.nz">brett@bsk.co.nz</a>	O	Y	Y	Do not designate any further land on this property [304A Kaharoa Road] as SNA. RLC must revisit this policy and reconsider how it proposes to fund and manage SNAs rather than placing financial impositions on rural landowners. It must also review the process that has been undertaken by RLC Officers and look at all concerns raised.	RLC & BOPRC are not offering any assistance or incentives to landowners for SNAs and have proven that they cannot fund or manage existing SNAs. Existing covenanted areas on our property account for 18% (3.98ha) of our total land area. We have observed the rules relating to the covenants and have applied the same to uncovenanted areas. There has been no financial assistance or rate remittance from RLC/BOPRC. Ceding control of a further 2ha of our property would make farming operations difficult by adding time to stock movements and force us to relocate a water supply for our stock. RLC want more of our land because of our efforts to protect the native plants.	Federated Farmers	6	6.35	S	Y	Y	Allow submission.	It is FFNZ's understanding the sentiment expressed in the submission is widely shared by other affected landowners.	
Site 679 - Te Waerenga Road 2	35	35.01	Walshe, B	<a href="mailto:brett@bsk.co.nz">brett@bsk.co.nz</a>	O	Y	Y	Do not designate any further land on this property [304A Kaharoa Road] as SNA. RLC must revisit this policy and reconsider how it proposes to fund and manage SNAs rather than placing financial impositions on rural landowners. It must also review the process that has been undertaken by RLC Officers and look at all concerns raised.		Director General of Conservation	5	5.29	O	Y	Y	Disallow the submission point. Schedule the entire area of site 679 as per Director-General's submission	Area contains significant indigenous vegetation. The Director-General also considers that assurance that the site meets SNA criteria could be increased if groundtruthing is undertaken	
a) General	35	35.02	Walshe, B	<a href="mailto:brett@bsk.co.nz">brett@bsk.co.nz</a>	O	Y	Y	Do not designate any further land in the Rotorua District as SNA. RLC must revisit this policy and reconsider how it proposes to fund and manage SNAs rather than placing financial impositions on rural landowners. It must also review the process that has been undertaken by RLC Officers and look at all concerns raised.	RLC & BOPRC are not offering any assistance or incentives to landowners for SNAs and have proven that they cannot fund or manage existing SNAs.	Federated Farmers	6	6.36	S	Y	Y	Allow submission.	It is FFNZ's understanding the sentiment expressed in the submission is widely shared by other affected landowners.	